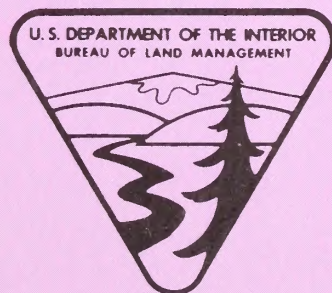




FINAL ENVIRONMENTAL IMPACT STATEMENT

SUPPLEMENT NO. 2

LIVESTOCK GRAZING MANAGEMENT ON NATIONAL RESOURCE LANDS



**U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

DECEMBER 31, 1974

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June 7, 1974

Mr. Curtis J. Berklund, Director
Bureau of Land Management
U. S. Department of Interior
Washington, D.C. 20240

Dear Mr. Berklund,

RE: DEIS Livestock Grazing
Management on National Resource
Lands

The Bureau of Land Management has before it today an opportunity and an important challenge to meet head-on one of the West's most urgent environmental concerns, if not its number one problem - grazing management. For too many years the subject of grazing on public lands has been largely ignored by the vast majority of Americans. Recently it has come of age.

As your draft environmental impact statement (DEIS) clearly points out on pages I-19 through 28, the "history and background" of these grazing lands has been one of public apathy, over exploitation, inadequately funded management programs, overgrazing, traumatic ecosystem changes, and a whole host of lesser ills. The Taylor Grazing Act in 1934 attempted to correct some of these ills; however, sufficient needed management tools did not surface until the 1960's (e.g. Classification and Multiple Use Act of 1964, Allotment Management Plan Programs, Public Land Law Review Commission recommendations, etc.) At long last, in theory at least, livestock grazing, fish and wildlife, watershed protection, outdoor recreations, timber and mineral production, etc. could be considered partners. We have in fact a great challenge ahead to see this goal now become a reality.

The number one problem in the management of grazing lands must be their treatment as a "political football." Lack of knowledge, underfunding, etc. are distant though important second cousins. Mr. Harrison Loesch, former Assistant Secretary of Interior, candidly answered the question - why doesn't BLM restrict grazing (in Arizona). "I'd be inclined to pull every head of cattle off the range in Arizona until the drought is over. Every time you lower a man's grazing a bit, you get a squawk. So you have to do it gradually or get into a big Congressional hassle." 1

That's the crux of the matter: the political power of the livestock industry. An Arizona BLM range manager explained, "Whenever we try to cut the number of cows, a rancher will write to his Congressman, and pretty soon word comes down from headquarters: Let them graze."

¹"Nibbling Away of the West," J. N. Miller, Reader's Digest, 12/72.

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This type of political expediency does not properly serve the live-stock industry, the land, nor the public's interest and until it is curtailed, sound grazing management plans are unfortunately only a dream.

Your Bureau's DEIS is a good start towards addressing the requirements of NEPA. Obviously to have to write detailed individual statements on the thousands of "management units" would be counter-productive; however, we believe there are sufficient differences in management policies needed for different categories of grazed lands that additional corollary impact statements will be needed. We want to avoid hypothesizing an optimum number of statements but yet state that one blanket report for the 150+ million acres of grazing lands only begins to describe the overall environmental impact situation at hand.

A second major obstacle to properly managing public grazing lands is the lack of an enabling or organic act for BLM. Hopefully, this session of Congress will correct this oversight and give BLM the management tools that the Forest Service, National Park Service and other agencies had. It's all too clear that the philosophy of a "weak and politically or vested interest controlled" agency is anachronistic and a shameful disservice to BLM.

We commend your DEIS for addressing the subject of endangered and threatened species of fish, wildlife, and plants. Recent enactment of P.L. 93-205, The Endangered Species Act of 1973, will provide an exceptional challenge to your personnel - many of whom I know will be eager to take on this challenge. Your Bureau's 1972 establishment of the "Snake River Birds of Prey Natural Area" clearly indicates you were concerned with this subject prior to the recent public law enactment. It is important to bring out the point that management for endangered or threatened species is often compatible with other public land uses (e.g. existing water storage impoundments in the aforementioned Birds of Prey Area). Incompatibilities will likewise occur which enlightened management should be able to readily resolve. While on this subject BLM is custodian to a multitude of unique, and often ignored ecosystems and should very definitely expand their inventory of these lands. Historically and archeologically rich canyonlands need to be identified and will most certainly add to the recreational economic base of the effected region. Already your Utah office has started such an inventory. District managers in Wyoming and New Mexico, for example, have expanded their staffs and developed interdisciplinary teams made up of aquatic biologists, recreational planners, timber specialists, wildlife biologists, landscape architects, etc. to complement the work of the range and soil specialists.

The DEIS discussed the controversial topic of fencing and this subject certainly needs airing. Your recent workshop at Cheyenne, Wyoming and the efforts of your Wyoming district offices to resolve the "antelope/fence problem" are significant and a timely start to this longtime controversy of fencing. Certainly, as has been repeatedly pointed out by range managers, fencing can be used as a reasonable management tool. Proper range rotation of livestock, protection from over grazing, and destruction of streamside habitat, are just a few areas where fencing can be beneficial.

Flipping the coin over the construction of fences which fail to consider wildlife migrations (primarily antelope), restrict access to public

lands, or are placed to obviate the need for good herding practices do not represent a proper fencing policy. We assume that the recent Cheyenne Workshop will be a badly needed starting point for developing good fencing practices, designs, need assessment, etc. The testimony of the Lander Valley Sportsman Association at Cheyenne was outstanding and needs to be carefully studied.

Throughout your DEIS watershed and streamside protection were mentioned. The numerous problems associated with this subject urgently need to be corrected throughout the public lands. It is a well known biological and common sense fact of life that the streamside habitats form the life lines of survival in arid lands. Arizona's streams, to cite one example, are for the most part in horrid condition, though admittedly bad grazing policies are only one of the many culprits. Destruction of vegetation all too often exacerbates the flooding problem, destroys valuable wildlife cover, prevents or at least slows aquifer recharge, is esthetically ghastly, and severely limits recreational opportunities. Enough said, the sound management of aquatic habitat will benefit all segments of the user public, both producer and consumer. It has been a neglected topic for far too long.

55-1 [In reading and re-reading the DEIS and also the Public Land Law Review Commission's (PLLRC) final report (chapter 6), there is an item tangentially discussed but not elucidated. Since it is at the very crux of sound grazing land management we believe it must form one of the bedrocks of the impact statement and all subsequent impact statements. Specifically, I am referring to the fact that grazing on public lands is a privilege and not a right. Repeatedly this principle has been under legislative attack most recently by Representative Aspinall with his abortive H.R. 7211 and the San Carlos Indian Reservation incident in Arizona this past year. As everyone now admits the initial establishment of grazing rights, their apportionment amongst different persons, etc., was one of the most blatant historic giveaways of entrusted public lands. However, it is conversely recognized by most people that the passage of time, resales of private ranches, etc., has in fact, established a monetary value to these grazing rights and it would be socially and economically chaotic to the ranching industry to re-adjudicate these vast numbers of grazing rights. Nonetheless, these public lands belong to the nation as a whole and proper stewardship is paramount. Grazing receipts should, to quote the PLLRC report, reflect fair market value and to the extent practicable these receipts must be "plowed" back into the lands to sustain a viable and perpetual resource. Many ranchers have accepted this concept of good stewardship on public lands and in fact have made significant range improvements. It is correct that this is done and should be reflected in an adjustment to the grazing fees, not by granting title or vested rights in the lands to the exclusion of other interests. Bad grazing practices likewise must be curtailed and therefore the "privileged usage" concept is so important to sustain.

Following up on the subject of grazing fees this topic has been discussed and re-discussed and can be summarized perhaps by the PLLRC recommendations 41 and 44:

Recommendation 41: Funds should be invested under statutory guidelines in deteriorated public grazing lands retained in Federal ownership to protect them against further deterioration

and to rehabilitate them where possible. On all other retained grazing lands, investments to improve grazing should generally be controlled by economic guidelines promulgated under statutory requirements.

Recommendation 44: Fair market value, taking into consideration factors in each area of the lands involved, should be established by law as a basis for grazing fees.

55-2 [Brief mention was made in the DEIS to the nine PLLRC recommendations relating to range resources. These must be more critically discussed in any range impact statement as they form a basic outline. Actually all of the issues inherent in these PLLRC recommendations were at least covered tangentially in the DEIS. Some of these are good, some should be challenged. Recommendation 37, discussing flexibility of forage policies and supporting regional economic growth, makes some good points. The insertion of the words "attain maximum economic efficiency" sound good but can lead to problems when trying to justify reservation of critical wildlife habitats or encouragement and protection of streamside vegetation to the exclusion of stock grazing.

It was a serious oversight in the PLLRC report that a "formal recommendation" was not made recognizing that the reservation of forage lands for wildlife could in certain areas or at certain times be the dominant grazing concern. The Taylor Grazing Act provides for the allocation of a "reasonable amount" of forage for wildlife though there are no statutory provisions requiring such allocation. We hope the DEIS and future statements will address the problem of wildlife forage needs and also that Congress will provide the necessary statutory provisions.

55-3 [Field observations in the western states point out a problem which was not mentioned and we hope will be addressed. Certain grazed lands require such extensive and costly management programs that the returns do not justify the expenditures. I am not referring to horribly overgrazed lands, as all of these urgently need financial commitments even if the rewards are in the distant future. Rather, I am referring to lands which, due to soil type, weather, or other natural conditions are just too marginal and are better left alone and ungrazed. This admittedly will cause isolated hardships on individuals but subsidization programs only defer funds from much more important management goals.

55-4 [Future impact statements should be mandatory on grazing lands which will sustain mining operations, especially strip mining for coal. As is well known, chaotic conditions will hit the ranching industry and range rehabilitation could take centuries.

The criteria established in your report for developing and implementing allotment management plans (AMP's) forms an excellent structural outline: I-12 (a) - (g):

- (a) potential for improving the watershed is clearly identifiable;
- (b) favorable cost-effect benefits (tangible and intangible) and least-cost factors;
- (c) allotments where grazing reductions are imminent and the purpose of the AMP would be to prevent the need for reduction in livestock use;
- (d) critical wildlife habitat is deteriorating and the AMP will include a grazing system with specific objectives for improving wildlife habitat;

- (e) increasing livestock forage production,
- (f) protecting and improving fisheries habitat; and
- (g) availability of private funds to invest in range improvements that are necessary components of the AMP.

As reported in chapter II of your DEIS the fact that only 13 to 31% of the BLM ranges (four biome types) can be classified as being in good or excellent condition should act as a stimulating catalyst for developing the above criteria. It incidently points out the need for adequate manpower funding and the coalescence of interdisciplinary teams within BLM state offices.

55-5 Chapter III of the DEIS provided a good, brief synopsis of the environmental impacts of livestock grazing. We urge that careful thought be given to all mechanical and chemical vegetation manipulation programs. There are several cases where chaining of sagebrush lands or man-introduced fires have wreaked havoc on ground nesting birds such as the Swainson and ferruginous hawks, two especially economically valuable species. If chaining is deemed necessary it should be done after the young birds are fledged. Pinon-juniper manipulation is in our opinion a highly questionable practice which needs to be carefully investigated. Too many "eyesores" already exist where this practice has taken place when the real issue wasn't water consumed by this type of vegetation but poor grazing practices. We look at chemical herbicide programs in much the same light (shadow). Too often they are used as a palliative on lands where the grasses are all but gone from over grazing and the "undesirable" plant species have taken over. How many herbicide spraying programs are followed by mandated, sound management programs?

55-6 It was refreshing to read that the subject of predator and rodent control was treated without the high degree of negative bias as was common in years past. Perhaps the acceptance of the complex inter-relationships of predator-prey species in the ecosystem and their esthetic values to many Americans has at last come of age. The most optimistic individual would not predict complete unanimity on this subject, nonetheless the eradication of either predators or livestock from the public lands will not serve the nation's interest. Your mentioning of secondary poisonings of scavengers, disruption of the predator-prey relationship, food chain, and life processes, etc., by animal control measures is certainly an acknowledgement of the complexity of this issue. We do take issue with the final sentence on page III - 38, to wit: "The survival of young (wildlife species) has been improved by predator control." This has never been substantiated as a wise wildlife management tool except on a localized or temporary status. It is in fact a fraudulent myth when applied broadscale. So as not to belabor this aspect of grazing land management, it was, as stated previously, refreshing to see the complexity of the issue acknowledged.

In conclusion, it would be difficult to choose any of the four alternatives outlined in section VIII - 1. The pros and cons were well discussed and with a few reservations and clarifications (brought up in this statement) alternative D is by far the best choice. Reviewing briefly each of the four alternatives:

Alternative A - Custodial - "is more of the same, bureaucratic, presents a very unchallenging role for BLM, is a disservice to the nation, an insult to the livestock industry, etc."

Alternative B - No Grazing - would be chaotic to the livestock industry, a violation of the Multiple Use Concept which is violated all

too often, and would precipitate another range war."

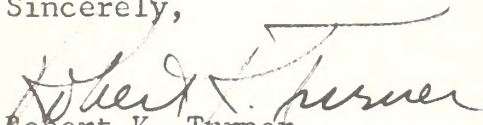
Alternative C - Maximize Livestock Production - "makes a mockery of ecosystem management, destroys biological diversity, and negates the Multiple Use theory. Hopefully our nation will never become so desparate."

Alternative D - Accelerate the Livestock Grazing Management Program - "clearly the route to go providing it is not equated with accelerating livestock grazing or infusion of massive subsidy programs on marginal lands."

In summary, if the political influence which overrides sound land management decisions can be eliminated, the major battle for assuring good grazing lands (and practices) can be won. Untie BLM's hands by providing an Organic Act, adequately fund BLM field staffs to be trained as a team in ecosystem management, consider grazing on public lands a privilege and not a right, follow the Multiple Use Concept, accept the philosophy that the Public Lands are the public's lands, consider this DEIS as a first step in satisfying NEPA's requirements, and the war will be won.

Thank you for accepting our comments as an official reply to the Draft Environmental Impact Statement - Livestock Grazing Management on National Resource Lands.

Sincerely,


Robert K. Turner
Regional Representative

RKT:lbp

cc: Mr. Rogers C. B. Morton, Secretary of Interior
Mr. Jack Horton, Assistant Secretary of Interior, Land & Resources
Congressmen in the six-state Rocky Mountain Region

Key No.

- 55-1 Section 3 of the Taylor Grazing Act clearly shows that the issuance of grazing privileges does not constitute a right, title, interest or estate in or to the lands being grazed.
- With respect to the grazing fees charged to authorized users, the present fee schedule will bring fair market value (FMV) by 1980. The FMV was determined by a comprehensive study conducted under the direction of the Departments of Agriculture and the Interior in 1966.
- 55-2 The Public Land Law Review Commission report is only one of many documents that discuss the subject of grazing on public land. The document was used as a reference in the preparation of the impact statement. A discussion of the wildlife forage needs as proposed by the reviewer would not be appropriate in an environmental impact statement on livestock grazing.
- 55-3 Livestock grazing should be terminated on lands not suitable for this use. Approximately 10 million acres of national resource lands are estimated as not suitable for livestock grazing. Additional lands may be identified as not suitable upon the development of management framework plans.
- 55-4 An environmental impact statement is being prepared with respect to coal leasing on Federal lands.
- 55-5 All of the supportive measures proposed in connection with management action will be subject to an environmental analysis that must consider those impacts mentioned by the reviewer. Likewise the effectiveness of the project must be guaranteed to the fullest extent possible by follow-up management.
- 55-6 Text revised. See page III-28 of the EIS.

National Council of Public Land Users

P. O. Box 811

Grand Junction, Colorado 81501

Paul Maxwell, President

July 22, 1974

Herbert Snyder, Secretary

Bureau of Land Management
United States Department of the Interior
Washington, D. C. 20240

Gentlemen:

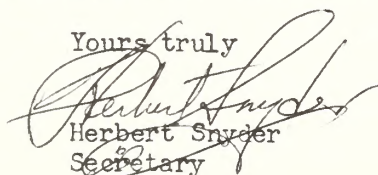
Re: Draft Environmental Impact Statement on
Livestock Grazing on Public Lands

56-1 The draft impact statement is an excellent example of political promotion, completely lacking in concept of the damage resulting from domestic livestock grazing on the federal public lands.

Table I-1, page I-5 is an excellent example of how to raid the federal treasury for the benefit of a few special-privileged domestic livestock graziers. At the same time, continuing a program that has been destructive of the federal public land watersheds, flora and fauna.

It is incredible that the citizens of the nation would accept a program of destruction of the resources of the nation in exchange for such largess as suggested by the impact statement. The price of this "Washington Pay Off" has gotten to be more than it's worth. Domestic livestock grazing on the federal public lands must cease.

Yours truly


Herbert Snyder
Secretary

Copy to: Natural Resources Defense Council
Senator Floyd Haskell
Senator Peter Dominick
Friends of Animals, Inc.
Field & Stream Magazine

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BUREAU OF
LAND MANAGEMENT
COMMUNICATIONS SECTION

National Council of Public Land Users

Key No. 56

Key No.

- 56-1 The environmental impact statement is written to comply with provisions of the National Environmental Policy Act, enacted by Congress through the will of the people. Many individuals, groups, organizations and state and local agencies were consulted in the preparation of the environmental impact statement.

NATIONAL RECREATION AND PARK ASSOCIATION

1601 NORTH KENT STREET, ARLINGTON, VIRGINIA 22209

(703) 525-0606

June 26 , 1974

Curtis J. Berklund
Director
Bureau of Land Management
U.S. Dept. of Interior
Washington, D. C. 20240

Dear Mr. Berklund:

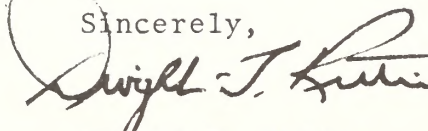
Daniel Poole, President of the Wildlife Management Institute, wrote you on June 7, 1974 relative to the draft Environmental Impact statement "Livestock Grazing Management on National Resource Lands."

On page 2 of Mr. Poole's letter, he refers to problems of recreational access to public lands and the lack of attention to this problem in the draft Environmental Impact statement.

57-1 The National Recreation and Park Association concurs with and strongly endorses the Wildlife Management Institute's comments in this regard and encourages the Bureau of Land Management to rectify this situation.

Thank you for your consideration.

Sincerely,



Dwight F. Rettie
Executive Director

National Recreation and Park Association

Key No. 57

Key No.

57-1 Public access is considered in the management framework plan for a given geographic area. As appropriate, it is considered in the formulation of all activity plans (e.g., wildlife, forestry, etc.).



National Wildlife Federation

1412 16TH ST., N.W., WASHINGTON, D.C. 20036

Phone: 202-483-1550

July 15, 1974

Mr. Curtis J. Berklund, Director
Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Dear Mr. Berklund:

The National Wildlife Federation is pleased to comment on the Draft Environmental Impact Statement - Live Stock Grazing Management on National Resource Lands, March, 1974.

We are cognizant of the work required to prepare such a document and we commend you for your efforts. However, we do not agree that it is a complete impact statement for the forage on the National Resource Lands (NRL) which is used not only for domestic livestock, but by wildlife and wild horses and burros as well. The statement assumes that grazing of domestic livestock is the primary use of forage on the NRL. We believe that the statement should address the question of the use of the forage resource by all groups on an equal basis.

58-1

The major portion of the NRL is classified for retention for interim management under multiple use and sustained yield principles. Until Congress legislates otherwise, we consider the management of wildlife as one of the multiple uses which must be considered in the same light as grazing of domestic livestock. The principle thrust of the statement is for the production of forage for domestic livestock. Production of forage for wildlife is considered only as a spin off, and provisions for the benefit of wildlife are not considered on their own merits. The problem of good wildlife management in many cases is dependent upon good livestock management. We, therefore, do not consider that this statement deals adequately with the wildlife program.

We commend you for the progress which has been made in the Allotment Management Planning (AMP) Program. We consider this one of the most significant thrusts of the Bureau which holds great potential for improved range conditions. We regret that forecasted funding will not permit maximum acceleration of this program. We are especially appalled that the program will not be completely implemented until the year 2000. Certainly for such a worthy program, departmental goals can be adjusted to complete the program in ten years.

National Wildlife Federation

Mr. Curtis J. Berklund, Director
Bureau of Land Management
Department of the Interior

-2-

July 15, 1974

58-2 We do not agree with your statement that "significant changes in grazing management will not be made until the MFP's (Management Framework Plans) are completed." You estimate that the MFP's will be completed in the year 1980. This of course depends upon funds available and the target date could slip to the mid- or late-1980's. We believe that individual MFP's will be completed prior to that date. But to wait 6-10 years before significant changes in grazing management will be made is unacceptable. Realizing that you may consider them out of context we quote your statement as follows:

"1) Over grazing by domesticated animals was one of the first destructive changes produced by man in his environment (p. 11-7).

"2) Overstocking that is not corrected produces over use which over a long period of years is reflected in changes in the kinds and amounts of vegetation. (p. 11-9)

"3) The destructive changes in native ranges caused by overgrazing do not occur on well managed grazed lands. (p. 11-10)

"4) Uncontrolled populations of wild ungulates, lagomorphs, rodents, and grazing insects -- are just as damaging to net primary production as over grazing by livestock. (p. 11-10)

"5) Although certain rangelands will continue to deteriorate during the interim period implementation of the AMP program by the year 2000 will result in a reversal of declining trends (p. 1-12)

"6) Information derived from the 1964 range condition and trend -- indicates the following: (p. 11-4)

2 percent in excellent condition
29 percent in good condition
53 percent in fair condition
14 percent in poor condition
2 percent in bad condition"

The 1964 range condition and trend, while 10 years old, shows that some of the conditions of the range may have been attributable to 1,2,3, and 4. Number "5" offers a solution on how to correct the system by the year 2000. Assuming that there has been considerable improvement since 1964 we still have a range condition which needs attention now. We find it hard to believe that you intend to wait to correct abuses.

58-3 We are not in agreement that the estimated seven million acres of "section 15" public lands should "continue to be administered on a custodial program subject to environmental safeguards." (p. 1-9) The isolated tracts may be as important to many communities for their other uses as for grazing.

National Wildlife Federation

Mr. Curtis J. Berklund, Director
Bureau of Land Management
Department of the Interior

3
-2-

July 15, 1974

While the discussion of the Palouse Prairie is interesting it is not relevant to the bulk of the NRL grazing program.

The four alternatives suggested in the Statement mainly support the proposal. Our brief comments are:

Alternative A - this would be totally unacceptable in view of our many pressing needs for land in the future;

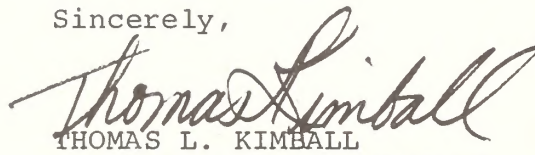
Alternative B - this again is totally unacceptable and would be a disservice to those who now graze on the public domain;

Alternative C - this is again an unacceptable solution in view of the multiple use needs;

Alternative D - this is an acceptable alternative and one which should get top priority consideration. But essentially it is the DEIS proposal with a shorter time schedule.

In summary we hope you will consider our suggestion that the Environmental Impact Statement be revised to more adequately consider the wildlife needs on an equal basis with domestic livestock. Further, environmental protection and prevention of damage to the resource should be the principal consideration in developing the Statement.

Sincerely,



THOMAS L. KIMBALL
Executive Vice President

Key No.

- 58-1 The EIS addresses the effect of livestock grazing management on the NRL and the resources thereon. It makes no assumption that the primary use of vegetation on NRL is for livestock forage but attempts to assess the impacts when vegetation is used for livestock forage. The production and use of vegetation for wildlife habitat would properly be addressed in an EIS on the wildlife habitat management program. However, the Bureau does give attention to vegetation requirements of forage users other than livestock. This is shown by the fact that wildlife habitat and other requirements for vegetation are considered in designing livestock grazing systems.
- 58-2 In this instance, the statement refers to MFP's individually, not collectively. As of July 1974, MFP's were completed on 51 percent of the NRL; by July 1975, 67 percent will be covered; by July 1976, 82 percent will be covered and by July 1980, all NRL will be covered by MFP's.
- Action to implement the MFP's will take place as soon after completion as funding will permit. BLM is not waiting until 1980 to take necessary actions.
- 58-3 It must be emphasized that the 7 million acres of isolated tracts referred to in the text are not all section 15 lands. Some section 15 lands are very important from the multiple use concept. The Bureau's planning system process would identify those isolated tracts which would require more than custodial management.

Natural Resources Defense Council, Inc.

664 Hamilton Avenue

Palo Alto, Calif. 94301

415 327-1080

New York Office
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New York, New York 10036
212 869-0150

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1710 N Street, N.W.
Washington, D.C. 20036
202 783-5710

June 13, 1974

Mr. Curtis J. Berklund
Director
Bureau of Land Management
Department of the Interior
Interior Building
Washington, D.C. 20240

Re: Comments on the Draft
Environmental Impact Statement
on "Livestock Grazing Management
on National Resource Lands"

Dear Mr. Berklund:

We have reviewed the above-captioned draft environmental impact statement and submit these comments on behalf of the Natural Resources Defense Council, Inc., the Ada County Fish and Game League, the National Council of Public Land Users, the Nevada Outdoor Recreation Association, Inc., the Oregon Environmental Council, and James K. Morgan.

This draft statement constitutes the sole attempt by the Bureau of Land Management (BLM) to date to comply with the requirements of Section 102(2)(C) of the National Environmental Policy Act of 1969 (NEPA) with respect to its administration of livestock grazing on the Public Lands. We have concluded that it is totally inadequate in all respects.

59-1 The Natural Resources Defense Council, Inc. has previously submitted comments, dated April 20, 1973, on the "preliminary draft" of this impact statement. It would serve little purpose to reiterate those comments in detail here. The deficiencies we pointed out in those comments remain in this draft, and the Bureau has not responded specifically to them. Rather, the BLM seems intent on evading its obligations under NEPA, and in so doing has made a mockery of the impact statement requirement.

In what follows, we will first describe the Bureau's administration of livestock grazing and then discuss the application of NEPA thereto and to the draft statement. Livestock grazing takes place on the Public Lands by virtue of federal permits, licenses or leases (hereinafter

collectively referred to as "permits") granted to private stock operators. These permits are issued or renewed annually by each of the BLM's 52 grazing districts 1/ pursuant to the Federal Range Code for Grazing Districts, 43 C.F.R. §§ 4110.0-2 et seq. (hereinafter "the Range Code"). According to the Range Code, these districts constitute the basic management unit in the BLM's administration of the Public Lands. The Range Code requires that each district assess the specific resource conditions of the Public Lands within its boundaries and the effects of grazing thereon. Each district must decide, in connection with the issuance of permits, whether an area is suitable for grazing based on this assessment and, if so, what numbers and types of animals should be permitted to graze thereon and during what seasons, as well as the particular management practices which should be employed. 2/

59-2 The draft admits that grazing may have significant adverse environmental effects on the resources of the Public Lands. (pp. III-1-65). Moreover, in acknowledging that the actual environmental impact of livestock grazing "on the surface environment depends largely on the ecological relationships that have developed in the area" (p. II-1), the draft makes clear that these effects can only be assessed at the local level. Consequently, compliance with NEPA requires that the agency prepare environmental impact statements for use in the issuance or renewal of permits which assess in detail the impact of grazing on the specific resources of individual districts. However, no such site-specific impact statements have ever been prepared by the Bureau.

1/ These districts, established by the Secretary of the Interior pursuant to the Taylor Grazing Act, contain over 160 million acres of public lands, approximately 90% of which are grazed.

2/ According to the draft statement: "Management of livestock grazing includes any one, or any combination of the following practices:

1. Adjustment in numbers of livestock;
2. Changing season, frequency, or intensity of livestock use;
3. Changing class of livestock, i.e., sheep, cattle, horses;
4. Deferment of livestock use;
5. Rotation of livestock use;
6. Rest from livestock use;
7. Improved distribution of livestock use;
8. Removal of livestock, temporarily or permanently, from areas within a grazing allotment where livestock grazing is not compatible with other resource values and uses." (p. I-3).

This draft certainly does not purport to be a detailed analysis of the impact of grazing in any particular district. Even now that the programmatic statement has finally been issued, at least in draft form, the Bureau is still refusing to make a commitment to prepare the type of impact statement that NEPA requires. 3/

The instant programmatic statement purports to accomplish two objectives: (1) to describe generally the adverse impacts of livestock grazing and how the Bureau will attempt to mitigate them, and (2) to analyze the available broad national options for management of grazing on the Public Lands.

With respect to the draft's first objective, it has already been demonstrated that NEPA's requirements cannot be met by an abstract discussion of either the adverse impacts of grazing or available mitigating measures. Additionally, one must question the Bureau's good faith in alleging that the adverse impacts of grazing will be mitigated, since the draft concedes that agency efforts in this direction have "slowed considerably." (p. I-8). 4/

59-3 3/ The draft states that "[i]t will serve as the foundation for subsequent environmental analyses and statements that may be required." (p. I-1) (emphasis added). This assertion clearly falls short of a definite commitment to prepare site-specific impact statements.

4/ In fact they are at a virtual standstill. As described in the draft, mitigation of the adverse impacts of grazing is accomplished by a detailed grazing management plan tailored to the specific resources of a particular area. In 1970, the BLM estimated that approximately 1,136 of these plans would be "in effect" through FY 1969, and that 200 more were planned for FY 1970. Bureau of Land Management, Budget Justifications F.Y. 1971, p. 19. However, according to the draft, as of June 30, 1973, only 1,015 plans were implemented, with an additional 214 completed but not implemented as of that date (pp. I-10-11). Thus, there are now 107 fewer plans than it was estimated would be in effect through FY 1970, and only 25,000,000 acres or 18% of the total acreage requiring such plans affected in all. (Id. at I-8). The BLM estimates that 108,000,000 acres or "about 82%" of the total remain in need of plans (p. I-2), and this figure does not include an additional 10 million acres subject to grazing which the BLM states are unsuitable for grazing. (p. I-9).

59-4 Moreover, there are unexplained omissions of information about the negative impacts of grazing in this draft, which are known to the Bureau and were discussed in its earlier versions. For example, the first version of this draft, dated March, 1973, contained a relatively candid, although incomplete, discussion of specific improper grazing practices permitted by the Bureau in its administration of livestock grazing on the Public Lands, and the adverse impacts thereof. 5/ In the second version of the draft, dated October, 1973, this discussion was "replaced" by a brief analysis of the adverse impacts which would result from continuation of "the current grazing program." 6/ The current draft, however, contains no discussion of the "current program," or any specific improper practices, or the adverse environmental impacts thereof.

It is difficult to conceive that in the passage of only a year there would have been a sufficient change in circumstances or information concerning the conditions of the Public Lands to warrant these changes in analysis. Rather, these changes suggest that the BLM has fundamentally misconceived the entire impact statement process and its goal. They suggest that the Bureau views this impact statement as a public relations document, rather than as a document which fully and openly discloses "all known possible environmental consequences" 7/ of federal action.

59-5 As noted, the draft also purports to be an analysis of available national policy options for management of grazing. In actuality, however, the draft omits so much essential information that it has no utility in this regard. Specifically, the draft fails to present the type of quantitative data needed for an adequate analysis of national options. While the draft does present data illustrating the economic impacts and effects on forage production which assertedly will result from implementation of the proposed form of management and alternatives thereto, it omits the following essential quantitative data:

5/ See BLM, The Preliminary Draft Environmental Programmatic Statement for Intensive Livestock Management on National Resource Lands, pp. 158-160. See Comments of the Natural Resources Defense Council, Inc. and National Wildlife Federation on the Preliminary Draft (April 20, 1973), pp. 12-13.

6/ See BLM, Draft Environmental Impact Statement: Livestock Grazing Management on National Resource Lands, pp. VIII-1-10.

7/ EDF v. Corps of Engineers, 325 F. Supp. 749, 759 (E.D. Ark. 1971).

59-5
(cont.)

- (a) information concerning total non-forage resources of the Public Lands such as the total acreage supporting various species of wildlife and fish habitats, and the respective conditions thereof;
- (b) information concerning the cumulative adverse impacts of grazing, such as total soil and wildlife loss attributable thereto; and
- (c) information concerning the cumulative impact of proposed mitigating management measures, including for example, the total number of acres of Public Land that will be fenced to contain or exclude livestock, and the total number of acres which the Bureau proposes to treat mechanically or with herbicides to control vegetation growing thereon.

These examples of significant omissions from the draft, while far from exhaustive, illustrate clearly how this draft fails to present a thorough discussion of the overall cumulative impacts of the proposed form of management and its alternatives. Instead, the draft offers a discussion of the problems associated with grazing and its management that is superficial and lacking in facts or objectivity.

In sum, in the preparation of the instant draft programmatic statement, as well as in its refusal to prepare site-specific impact statements, the BLM has evidenced a fundamental misconception of the goals and purposes of NEPA.

It would seem to be long past the time for a federal agency to entertain such misconceptions, and to continue to conduct business "as usual" in disregard of everything that Act was intended to accomplish. However, this basic neglect of the purposes and procedures of NEPA has characterized the BLM's approach to the administration of grazing on the Public Lands for the last four years, and unfortunately, there is nothing in the draft to suggest that it intends to do otherwise in the future.

The requirements of NEPA and its application to the BLM's administration of grazing on the Public Lands are clear. We remain hopeful that the Bureau will voluntarily correct the errors in the programmatic statement, and that it

will announce immediately its intention to prepare site-specific impact statements for use in the issuance of grazing permits under a prescribed timetable.

Very truly yours,

Johanna Hwald

Johanna H. Wald

Roger Beers

Roger Beers

JHW/RB/gg

cc: Hon. Rogers C. B. Morton
Hon. Russell W. Peterson
Hon. Russell E. Train
Sen. Henry Jackson
Sen. Edward Kennedy
Rep. James Haley
Rep. Craig Hosmer

Key No.

- 59-1 In development of the Draft EIS, the Bureau was responsive to comments received by reviewers of the "preliminary draft," and incorporated many comments and suggestions in an attempt to prepare a more comprehensive EIS. In addition, consultation with individuals, groups, organizations and agencies resulted in additional input. Again, in development of the Final EIS, a similar approach was taken.
- It is difficult to assess the reviewer's comment that "the deficiencies we pointed out---remain in this draft," in view of the fact that the Draft EIS is markedly different from the preliminary draft. However, in reviewing the April 20, 1973 letter written in regard to the preliminary draft of March 1973 (see Key No. 59a, Supplement II) as it may be applicable to the Draft EIS, the Bureau has attempted to be responsive. Many of the reviewers' comments in the review of both drafts are more related to interpretations of the National Environmental Policy Act than to an analysis of the EIS. Other comments resulted in revisions of the EIS and the inclusion of additional data.
- 59-2 See item 3, page IX-6 of the EIS. Environmental Analysis will be undertaken on all AMP's and on those determined likely to have a major and significant effect on the quality of the human environment, an environmental impact statement will be prepared. All AMP's are clearly not going to be of such nature as to require a formal EIS.
- 59-3 Page I-1 of the EIS has been revised for clarity in describing the purpose and scope of the EIS.
- 59-4 As mentioned under response to comment 59-1 above, the Bureau had the benefit of significant public input into development of the EIS. During preparation of the Final EIS, several drafts were prepared, two of which were circulated for comment and review (March 1973 and April 1974--the official Draft EIS). The draft EIS discusses the "current program" in detail. The purpose of the programmatic statement is to evaluate the "current program."
- 59-5 As a programmatic EIS pertaining to livestock grazing management, detailed discussion of total non-forage resources must be considered outside the scope of this EIS.
- Impacts of livestock grazing were quantified to the extent possible. Impacts from livestock grazing in a complex environment affected by multiple uses and natural phenomena are not easily quantified.

Key No.

59-5 Table I-1, page I-4, provides an estimate of supportive measures
(cont.) projected for the program. These supportive measures are not
 presented as a mitigation in themselves.

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April 20, 1973

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Mr. Burton Silcock
Director
Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

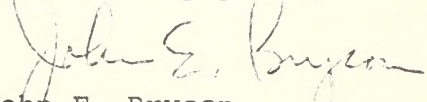
Dear Director Silcock:

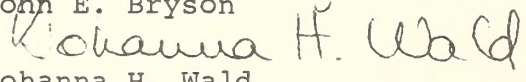
Enclosed are the comments of the Natural Resources Defense Council, Inc. and the National Wildlife Federation on the "Preliminary Draft Environmental Programmatic Statement for Intensive Livestock Management on Natural Resource Lands."

We find that the draft fails to comply with the requirements of the National Environmental Policy Act in many important respects and urge that an entirely new statement be prepared promptly.

Please contact us if we can be helpful in any way in the preparation of an adequate impact statement.

Respectfully yours,


John E. Bryson


Johanna H. Wald

JEB/jcs
Enclosure

cc: Hon. Rogers C. B. Morton
Hon. Earl L. Butz
Hon. Jack O. Horton
Hon. Russell B. Train
Hon. William D. Ruckelshaus
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Senator Edward M. Kennedy
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COMMENTS
OF THE
NATURAL RESOURCES DEFENSE COUNCIL, INC.
AND THE
NATIONAL WILDLIFE FEDERATION
ON
"THE PRELIMINARY DRAFT
ENVIRONMENTAL PROGRAMMATIC STATEMENT
FOR
INTENSIVE LIVESTOCK MANAGEMENT
ON
NATURAL RESOURCE LANDS"

Submitted by:

John E. Bryson
Johanna H. Wald

The Natural Resources Defense Council, Inc. (NRDC) and the National Wildlife Federation (NWF) submit these comments on the Bureau of Land Management preliminary draft "Environmental Programmatic Statement for Intensive Livestock Management on Natural Resource Lands".1/

We find the preliminary draft totally inadequate to inform the public and official decisionmakers about the environmental impacts of any ongoing major actions regarding private grazing on the nation's public lands and their reasonable alternatives. As such, the statement fails to comply with the National Environmental Policy Act of 1969 (NEPA).

1/

NRDC is a non-profit environmental law organization which seeks, principally through administrative and legal proceedings, to promote environmental protection and the conservation of natural resources. NRDC has more than 9,000 members and offices in New York, Washington, D.C., and Palo Alto, California. During the last year, NRDC has investigated in depth the BLM's management of private grazing on public lands and, in a series of letters and meetings, has expressed to BLM officials its concern with the poor condition of the lands and the failure to prepare environmental impact statements on any aspects of the management program for the 160 million acres which the BLM lets out for private grazing.

NWF, a nation-wide non-profit conservation organization, whose principal office is in Washington, D.C., is composed of associate members and members of state affiliate member organizations, comprising over 2,000,000 persons. NWF has had a long-standing interest in conservation of the public range, and, has, in the last year, intervened in BLM proceedings to oppose the renewal of grazing licenses to ranchers responsible for the illegal killing of golden eagles. NWF has also commented on and requested the prompt promulgation of regulations which would explicitly condition federal grazing privileges on compliance with laws concerning protection of natural resources and the environment.

59a-1

Two critical defects run through the entire statement. First, the bulk of the draft describes and promotes an "intensive grazing management system" which exists on only a very small fraction of the public lands and which, due to its great cost, skilled manpower requirements, and complexity^{2/} cannot reasonably be foreseen on a widespread basis anytime in the next decade.^{3/} The management system described in the draft, then, has nothing to do with the realities of ongoing major BLM decisions regarding private grazing on the lands.

Second, the statement deals only in gross generalities. Very little is quantified or documented.^{4/}

^{2/} Not to mention its dubious merit for most lands. See infra at p. 4-5 of Analysis.

^{3/} The draft treats this problem by assuming it away: "[T]he statement will not distinguish between the present and potential program. It is assumed that the possibility for expanded or universal application of intensive management practices does exist." (p. 2). No further explanation is given.

^{4/} Most statements are simply conclusory assertions. Thus, it is stated, at p. 202, that: "Perhaps the most undesirable aspect of livestock removal is that it eliminates a natural component, a readily available and easily manageable 'tool' which can be used to manipulate and complement natural ecological processes and mechanisms to achieve desired results." These are platitudes, conveying little precise meaning. What is meant by "natural component"? Why is it objectionable to remove livestock, whether a "natural component" or not, rather than wildlife which compete for the same forage and cover? What empirical or scientific data is there to show what the impact will be when livestock are used to "manipulate and complete natural ecological processes"? See also infra

59a-2 The statement appears to be less an objective disclosure than a "public relations" document designed to mask the existing major environmental problems of vegetation destruction, soil loss, siltation and sedimentation into major watersheds of the West, and forage and/or habitat loss to numerous species of wildlife, including fish, resulting from heavy private grazing of the lands.

59a-3 Unless a new and different statement is promptly prepared, major actions significantly affecting the public lands, including, for example, decisions to permit grazing in specific areas rather than withdraw livestock to protect critical watersheds, fragile lands or significant recreational and scenic values will continue to be made behind closed doors, in violation of NEPA.

59a-4 While some necessary information may best be presented in a national programmatic impact statement, most significant BLM actions allowing and regulating private grazing, to comply with NEPA, must be accompanied by specific, individual impact statements focused on the actual, on-the-ground environmental effects. The appropriateness of proposed actions and their reasonable alternatives depends on local conditions, including vegetation, soils climate, water resources, recreational, wildlife and other values.^{5/}

^{5/} See, e.g., BLM Manual, § 4111.32 c(1).

The present draft offers nothing to aid officials in the field or the affected public in making decisions concerning, for example, whether to renew grazing permits at any particular AUM level. The need to prepare individual impact statements on conditions and appropriate alternative management actions for the various BLM geographical units is detailed in our letter of January 8, 1973, addressed to Director Silcock.^{6/}

The most appropriate geographical unit for impact statements would appear to be the areas created for management framework planning. These areas were established because common conditions within them made planning as a unit sensible. The same considerations would make the areas appropriate for impact statements. Management planning and impact statement preparation should be part of the same process: the inventory data and delineation of alternatives required by NEPA is essential to optimal management planning.

There is a role for a national programmatic impact statement on private grazing on the public lands. Such a statement should serve two purposes. It should view

^{6/} The letter is attached to these comments as Appendix A. This view was also expressed in meetings on January 17 and February 21, 1973, between John Bryson of NRDC and Director Silcock and other senior BLM officials.

impacts nationally and ensure that they be seen on a cumulative basis, and it could relate the results of research and experimentation, thereby avoiding duplication of this information from one local statement to the next.^{7/}

59a-5

Thus, a programmatic grazing statement should develop and present the best available quantitative information about total soil and wildlife loss on the public lands, total sedimentation loads caused or aggravated by grazing, and the cost of this erosion in terms of lost aquatic life, deteriorated water quality, increased flood damage, rapid dam obsolescence, and increased dredging requirements. As an aid to multi-purpose planning, the statement should systematically indicate the acreages and percentages of the nation's lands, public and private, principally devoted to grazing, and those principally supporting wildlife and recreation, or reserved for their historic, geological or scenic values. The statement could

^{7/} This role for the programmatic impact statement has been recommended by the President's Council on Environmental Quality, the federal agency responsible for impact statement procedures: "It [the programmatic statement] provides an occasion for a more exhaustive consideration of effects and alternatives than would be practicable in a statement on an individual action. It ensures consideration of cumulative impacts that might be slighted in a case-by-case analysis. And it avoids duplicative reconsideration of basic policy questions." CEQ Recommendations for Improving Agency NEPA Procedures, 3 Environmental Law Reporter (BNA), Current Developments, (May 19, 1972, 85)

59a-5
(cont.)

thus assess the extent of these land commitments in the light of evolving national policy and values and with respect to other federal studies concerning, for example, the growing need for, and scarcity of, public recreation near urban areas, and the declining numbers of many forms of wildlife.

59a-6

A programmatic statement would also be the appropriate place for careful national cost-benefit evaluation of grazing on the public lands. The costs of the subsidy in below-market grazing fees, of fencing the wild lands^{8/} of building waterholes, of spraying, plowing and reseeding hundreds of thousands of acres, of lost wildlife and recreation, erosion damage and the environmental costs mentioned above should be weighed against the value of the beef and wool produced and the graziers supported. Such an analysis would provide a solid foundation for the presentation of national policy alternatives regarding the proper mix on the public lands of these largely competing purposes.

In addition, the programmatic statement could describe, in reasonable detail, studies and experiments bearing on alternative management schemes for the public lands. The inadequacy and one-sidedness of the few references to outside studies in the preliminary draft is transparent.

^{8/} Over \$ 1100 per mile.

Thus, it is stated that:

"The many long-standing fenced exclosures throughout the West bear evidence that the exclusion of grazing does not produce optimum range conditions. After 20 years or more of livestock exclusion, many of them have reached a point of vegetation stagnation which is well below optimum for watershed protection and forage production. (p. 202).

59a-7

This is the draft's treatment of one of the most important and controversial issues regarding the public lands: whether livestock grazing should be substantially curtailed or halted on important or abused ranges.^{9/} An objective and reasonably detailed treatment of the research done on exclosures and other relevant questions would best be done in a programmatic statement, eliminating the need for repetition and unnecessary bulk in statements focusing on local conditions.

This incomplete but representative indication of what could be done in a general statement on grazing as a real service to optimal decisionmaking stands in marked contrast to the present draft. The preliminary draft is a sharp disappointment to persons concerned with our public lands. The public knows far too little of the wildland resources

^{9/} Not only is the quoted statement unspecific and undocumented, but experts we have consulted with believe it is untrue -- exclosures of reasonable size demonstrate renewed vegetative vigor and tend to produce over time deep-rooted perennials necessary to soil and watershed protection. In fact, note that this quote is contradicted by the statement on p. 199 that "generally soil protection could be expected to improve [with the elimination of grazing]".

we own in common, but this draft suggests that the BLM would prefer to keep us in the dark and do business as usual with the graziers.

It is now well over three years since the effective date of the National Environmental Policy Act. We have waited, impatiently, for this impact statement which promised an objective, comprehensive and detailed look at private grazing on the public lands. Now in this pre-draft, we find no quantitative data, no information about what is actually happening on the lands, and a lack of objectivity. To date, the only response of the BLM to our repeated requests for impact statements on grazing has been the claim that the agency has insufficient manpower for a careful study. As the President's Council on Environmental Quality put it in another case, however:

If manpower problems are preventing effective implementation of the Act, we would have expected the Commission to be alert to this problem earlier. With almost three years having elapsed after the passage of NEPA, lack of resources no longer appear to us to justify -- if ever they did -- less than full compliance with the policies and procedures of NEPA, designed as they were to give content to an expressly announced commitment of this country to the protection of environmental values. 10/

10/ Comments of the Council on Environmental Quality regarding the failure of the ICC to prepare an impact statement in setting freight rates on recycled goods. See also, Calvert Cliffs' Coordinating Committee v. AEC, 449 F.2d 1109, 1115 (D.C. Cir. 1971): "The Section 102 duties are not inherently flexible. They must be complied with to the fullest extent, unless there is a clear conflict of statutory authority. Considerations of administrative difficulty, delay, or economic cost will not suffice to strip the section of its fundamental importance." (emphasis supplied)

NRDC and NWF are of the opinion that the preliminary draft statement is so fundamentally inadequate that no amount of revision of the present organizational and conceptual structure could result in a document which complies with NEPA. We recommend that it be discarded, and that the Bureau begin immediately on a statement which would disclose fully the impacts of ongoing grazing management actions and which would aid decisionmakers in determining what policies would best serve the public interest in our federally-owned lands.

NEPA IMPACT STATEMENT LAW
AND A
SECTION BY SECTION ANALYSIS
OF THE
PRELIMINARY DRAFT

I. Introduction

This analysis generally follows the order of presentation of the preliminary draft, and, for the most part, is confined to the major defects of each section. We do not comment on the program for Alaska, which presents problems markedly different from domestic grazing in the eleven western states.

II. NEPA and Impact Statements

Section 102(2)(C) of NEPA requires, first, that federal agencies study and disclose fully the environmental effects of proposed actions and alternatives to such actions; and second, that the agencies consider these effects and alternatives in their decisionmaking.

The purpose of an environmental impact statement (EIS) is "to aid in the agency's decisionmaking process and to advise other interested agencies and the public of the environmental consequences of planned federal action."^{1/} As the court in EDF v. Corps of Engineers^{2/} noted:

"At the very least, NEPA is an environmental full disclosure law . . . intended to make . . . decisionmaking more responsive and responsible. The detailed statement required by § 102(2)(C) should, at a minimum, contain such information as will alert the President, the Council on Environmental Quality, the public, and, indeed, the Congress to all known possible environmental consequences of proposed agency action."

^{1/} NRDC v. Grant, 341 F. Supp. 356, 364.

^{2/} 325 F. Supp. 749, 759 (E.D. Ark. 1971) (emphasis supplied).

And, in NRDC v. Morton^{3/}, the District of Columbia Circuit summarized the role of the impact statement as follows:

"Congress contemplated that the Impact Statement would constitute the environmental source material for the information of the Congress as well as the Executive, in connection with the making of relevant decisions, and would be available to enhance enlightenment of -- and by -- the public. The impact statement provides a basis for (a) evaluation of the benefits of the proposed project in light of its environmental risks, and (b) comparison of the net balance for the proposed project with the environmental risks presented by alternative courses of action."

To meet the burden of full disclosure, an agency is required to "explicate fully its course of inquiry, its analysis, and its reasoning."^{4/}

In addition, NEPA requires full consideration of this information in agency decisionmaking^{5/}, a balancing of the costs and benefits of the proposed action^{6/}, quantification of environmental values^{7/}, a thorough discussion of the "overall cumulative impact of the action proposed (and of further actions contemplated)"^{8/}, a thorough discussion of

^{3/} 458 F.2d 827, 833 (D.C. Cir. 1972).

^{4/} Ely v. Velde, 451 F.2d 1130, 1138, 3 ERC 1280, 1286 (4th Cir. 1971) (See also, Ex. Ord. No. 11514, § 2(b), 35 Fed. Reg. 4247 (1970) and CEQ Guidelines, §§ 3, 6, 10, 36 Fed. Reg. 7724 (1971)).

^{5/} Calvert Cliffs' Coordinating Committee v. AEC, 449 F.2d 1109 (D.C. Cir. 1971).

^{6/} Id

^{7/} NEPA, § 102(B)

^{8/} CEQ Guidelines, § 5(b), 36 Fed. Reg. 7724 (1971) (emphasis supplied).

alternatives to the proposed program^{9/}, and consultation with federal, state, and local agencies in the preparation of an impact statement^{10/}. None of these requirements is adequately met by the present draft.

III. Assumptions

The statement is based on an unwarranted assumption and consequently is inadequate, both in terms of describing the project and its environmental impacts.

The draft preliminary statement is explicitly based on an unrealistic and unsupported assumption -- that the very substantial federal funds required for the institution of "intensive livestock management" on the public lands will be forthcoming.^{11/} Beyond that, the statement fails

^{9/} NRDC v. Morton, 458 F.2d 827, 833 (D.C. Cir. 1972).

^{10/} 42 U.S.C. § 4332(2)(C); Ex. Ord. No. 11514, §§ 2(a), 2(f), 35 Fed. Reg. 4247 (1970); CEQ Guidelines, § 9, 36 Fed. Reg. 7724 (1971).

^{11/} In addition to the fact of generally increasing budgetary constraints, the executive action taken with respect to the R.E.A.P. program of the Department of Agriculture is an illustrative example of the low priority which the present administration places on land-related management programs.

Moreover, we assume, although the draft does not anywhere so state, that the funding for increased management of Federal ranges will be supplied exclusively by the federal government. If the Bureau proposes to institute "intensive livestock management" on the public lands with any degree of financial assistance from private operators, this policy should be explicitly stated and the steps that will be taken to minimize private proprietary interest in these lands and in "improvements" erected thereon should be detailed.

to address any of the important practical questions which arise assuming "intensive management" is implemented on a widespread basis: What is the total cost of implementation and how will this cost be allocated among construction, maintenance of "improvements", and expanded personnel? What is the schedule for implementation? According to what priorities will the lands on which it is to be implemented be selected? On what lands and under what conditions is "intensive management" most likely to succeed? Where will the BLM find enough trained men to properly oversee implementation, and how will they ensure that graziers adhere to the strict and complex requirements of rest-rotation or other intensive management systems? Will the BLM, contrary to its present regulations, force unwilling permittees to participate?

IV. Description of the Proposal

Significantly, this section and the statement as a whole, fail to present the view of many responsible range ecologists who feel that the rest-rotation grazing and other intensive management systems can contribute to better range management only on the best range areas and only where substantial supervision is given. Their view is that "intensive management" is inappropriate on much, if not most, of the public lands given their physical and topographical conditions. They feel, in addition, that rotation systems have, in any event, very severe practical impediments because of the

complexity involved in determining proper rest and rotation periods based on varying plant physiology, soil, and climate conditions, the lack of sufficient skilled personnel to initiate, guide and monitor such systems, the reluctance of graziers to adhere to rest requirements, and the great cost of necessary waterhole and fence construction. According to observers, the BLM gives lip service to rest-rotation grazing in order to ward off public pressure to reduce the numbers of stock on the public range. The theory that the BLM can allow heavy domestic grazing and at the same time protect the range has undeniable political appeal. A more objective, realistic look is required by NEPA.

In addition to this major omission, the information supplied in this section is insufficient. While the number of AMP's instituted and the number remaining are supplied, the statement fails to state the corresponding number of completed and uncompleted unit resource analyses (URA's), and the number of AMP's and MFP's, if any, instituted without URA's 12/.

In addition, where rest-rotation or other "intensive management" is to be implemented, it should be preceded by an environmental impact statement and a cost-benefit

12/ In connection with the preparation of MFP's we object to the assertion that the "Bureau planning system provides for extensive public participation. . ." (p. 22). Since the Bureau fails to publish notification concerning the development of MFP's, indicating significant resource values, e.g., historic, geographical or wildlife interest, in the Federal Register, it perpetuates the domination of the decisionmaking process by those with a direct economic stake, the private permittees.

analysis on its specific costs and consequences^{13/}. Since the BLM has not yet prepared an impact statement on any grazing-related action, the continuing assertion that environmental analyses will be prepared to determine whether an EIS is necessary is empty rhetoric.

Similarly, the Bureau has failed to indicate what management practices will be employed on the lands which will not be subjected to "intensive management", and the environmental impacts of those practices. It should detail the procedures and regulations which will be followed to protect and restore, if possible, those lands. Such a discussion would necessarily include measures which will be taken to prevent the continuation of management practices with known adverse environmental effects such as those listed at pp. 158 and 159 of the preliminary draft, and others which were not included, but will be noted in this analysis.

V. "Grazing Management System" - p. 24-25.

Although this section asserts that "the key management component of a range ecosystem is vegetation," (p. 25), the statement fails to "explicate fully" the process by which the "key" vegetative species the system will be designed to protect or encourage is selected.^{14/}

^{13/} See supra at pp. 3-4 of "Comments," and infra p. 8.

^{14/} Statements such as "an appropriate objective might be to improve bitterbrush for mule deer in a particular area" (p. 1, Illustration I,) provide no standards or information about decisionmaking.

In addition, this section states that "[l]and treatment projects . . . are kept to a minimum and used only to expedite needed resource improvements that cannot be accomplished exclusively by livestock management within a reasonable time frame." (p. 24).^{15/}

This statement is another example of the draft's failure to separate the present situation from the utopian future it projects. The present reality is that mechanical and chemical treatment of vegetation is justified as a first step to permit the institution of rest-rotation grazing.^{16/}

The normative statement in the draft is apparently an effort to placate those who have objected to the widespread practice of indiscriminate conversion of millions of acres of federal lands from native forage to forage suitable for livestock.^{17/} The preliminary draft, however, fails to set forth the standards and procedures which will be used to keep such treatments at a minimum, and, indeed, fails to define a "reasonable" period of time. Nor does it indicate whether what is "reasonable" may differ given the

^{15/} It should be noted that this statement is contradicted by the following statement found at p. 141: "All artificial treatments will be used only where natural recovery is not possible."

^{16/} See Environmental Analysis/Mud Creek Brush Control, Vale Grazing District, Vale, Oregon, FY 1973: Spraying 8000 acres of sagebrush "will provide enough feed to support a rest-rotation grazing system." (p. 1)

^{17/} See, e.g., National Academy of Sciences, Land Use and Wildlife Resources (1970) pp. 116-117.

particular circumstances involved and the object of the mechanical treatment, for example, to improve a watershed as opposed to the accomodation of a permittee's desire to regain suspended AUM's.

VI. "Description of the Environment"

The extreme generality of this entire section indicates the need for impact statements on grazing management at the local level where real, on-the-ground decisions are made. Specific environmental impact statements should be prepared on each proposed management framework plan (MFP). Complex and varied environmental conditions exist on the public lands. Only when the focus is localized at the MFP level can there be a meaningful evaluation of proposed actions in terms of their actual environmental effects. Even the preliminary draft recognizes the importance of local conditions such as amounts, and range, of precipitation (for example, pp. 34, 125), of soil conditions and types (for example, pp. 36 and 63), topography (p. 60), and climate (p. 116), all of which bear directly on the amount of forage which can be produced and consequently on the numbers and types of livestock and wildlife that can be sustained. In fact, the BLM has elsewhere more directly conceded the primary significance of local conditions.^{18/}

^{18/} See, e.g., BLM Manual, § 4111.32 C(1): "such factors as soils, topography, elevation, precipitation, vegetative types . . . are the natural determinants" of the [p]roper . . . numbers of livestock and wildlife" which a particular range can support.

The statement fails to describe the
affected environment adequately

First, since the map of "National Resource Lands Managed by BLM," Figure 1 following p. 27, is so unclear, it is impossible to tell which states or parts of states are included in each biome, let alone which parts of which states are managed by the BLM. In addition, since all of the biome descriptions fail to focus exclusively or primarily on BLM-administered lands, it is even unclear whether all of the examples of areas of special interest, such as those noted on pp. 52 and 99, are found on BLM lands. The statement indicates that many areas of archeological, historical and geological interest, including primitive areas and "wild and scenic" rivers, as well as areas which should not be grazed at all, are found on BLM-administered lands, but the precise location of these areas is never given. As a result, it is impossible for either the public or decisionmakers to make informed judgments about the value of these areas, and whether they are being adequately protected at present.

Three examples of the many objectionable generalizations found in this section deserve to be noted. First, no information about the present poor condition of the public lands is supplied. Range conditions in each biome are described in general terms such as "fair to good" with no definition of what these terms mean. The statement fails

to supply any objective quantified data about the public lands, such as the present carrying capacity, the present trend, the amount of suspended non-use or the estimated potential grazing capacity of any area.

Second, with respect to wildlife, the statement fails to identify all rare and endangered species found on the public lands, although they are to be given "priority" (p. 42), and it fails to specify the location of these species in detail. Additionally, the statement fails to quantify wildlife dependence on the public lands. Statements such as certain lands "provide important summer grazing for . . . game animals" (p. 73) are insufficient. Reasoned decisionmaking requires the following representative information: How many wildlife AUM's do all BLM-administered lands now provide? What percentage of the total national wildlife needs does this represent? How many wildlife AUM's does each state and sub-region provide and at what times of the year? How are these AUM's calculated? What is the total estimated number of wild herbivores dependent on the public lands? Which wild herbivore populations are increasing and which are decreasing on the public lands and by what degrees? What is the total number of domestic livestock permitted on the public range? What is the total number of livestock AUM's and what months per state does this represent?

Third, the statement fails to make a careful, detailed analysis of water quality problems on the public lands. Almost all references to water quality employ vague and

undefined terms such as "generally adequate," p. 43, and "average" rather than objective quantified data. Although a few statistics regarding water quality are included, as on p. 89, no objective standards are given against which to weigh the information supplied.

The importance of a careful, detailed analysis of water quality problems stemming from the public lands and the impact of these problems for the rest of the nation can scarcely be overstated:

It is estimated that the average annual runoff from federal ranges in the major river basins of the West is 23 million acre feet of water, or only about five percent of the total annual flow of the streams in the states west of the Mississippi. On the other hand, it is estimated that federal rangelands produce 320,000 acre feet of sediment annually, exceeding the combined volume of sediment discharged by the Mississippi and Colorado rivers. From a watershed standpoint, therefore, we find the federal rangelands yielding a minor volume of usable water but producing a major portion of the sediment in western river basins. 19/

How the public lands are managed "determines the quality of watering entering" "vast acreages of lakes and thousands of miles of rivers and streams which do not lie on public lands."20/

19/ BLM report quoted in Hood and Morgan, "Whose Home on the Range?" Sierra Club Bulletin (May 1972) Vol. 57:5, pp. 7-8.

20/ Public Land Law Revision Commission, Background Studies, Vol. 2, p. 211. Hereinafter cited as PLLRC, Vol. 2.

VII. "Environmental Impacts of the Proposed
Action"

Poor Grazing
Practices

This section fails to disclose many significant poor grazing practices which the Bureau currently permits on the public lands. Among the poor management practices which are not acknowledged are trailing, dual use by livestock, use of areas not suited to grazing such as steep slopes, frail soil areas, and ephemeral areas, and chemical and mechanical vegetative manipulation and its impact.

A most important omission is the BLM practice of setting fees charged for private grazing at far below market value.^{21/} Because the fees are set artificially low, the demand for public land forage is increased. This increased demand results in overgrazing and utilization of areas unsuited for grazing, such as frail soil areas and those with very low grazing capacities.

In addition to these major omissions, this section discusses inadequately the adverse impacts of the poor practices it acknowledges. Adverse effects on wildlife are ignored or glossed over. For example, the statement fails to disclose that year-long grazing adversely affects wildlife by removing vegetation needed for cover as well as forage. Similarly, the discussion of the impact of

^{21/} See our letter, dated November 10, 1972, requesting the preparation of environmental impact statements on the setting of grazing fees.

"improper class of livestock" fails to include recognition of the fact that this practice maximizes livestock/big game competition for forage, and increases the need for fencing with consequent impact on wildlife migrations.

The Impact of Grazing on Non-Forage
Resources and the Resolution of
Potential or Actual Conflicts

Like the rest of the preliminary draft, the discussion at pp. 164-173 of Section 4 is too general and in no way augments the scanty and inadequate information about BLM-administered public lands supplied in Section 3, "Description of the Environment," discussed above. In addition, the section fails to:

- 1) comply with NEPA's requirement to:

"identify and develop methods and procedures, . . . , which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decision-making along with economic and technical considerations;22/

- 2) comply with NEPA's requirement that the decisionmaking process regarding resolution of conflicts between uses of various resources be explicated fully;23/
- 3) fully and accurately disclose environmental effects of the proposed program;24/ and
- 4) provide a cost/benefit analysis of the proposed action.25/

22/ § 102(B)

23/ Note 4 supra.

24/ See, e.g., NRDC v. Morton, note 3 supra.

25/ Calvert Cliffs note 5 supra.

1) The Statement Fails to Quantify Environmental
Values

The preliminary draft makes no effort to quantify "presently unquantifiable environmental . . . values." It is stated, for example, that: "The total effect of the landscape character of the grassland biome will vary with the individual observer. To one, openness may connote freedom Another may feel overwhelmed" ^{26/} The draft, in fact, explicitly concedes the failure to quantify:

"the value of just seeing a deer or sage-grouse or other species of wildlife during a recreational outing is very high for most people, but the science of economics has not been able to place a monetary value on such an experience in order that it may be compared to grazing and similar values." (p. 173)

While it is difficult to place a quantitative value on non-commercial resources, the failure to do so has often contributed to their loss vis-a-vis commercial resources with a clear dollar value. It is for just this reason that NEPA insists on quantification of environmental amenities. ^{27/}

^{26/} Similarly, at p. 72: "To some, mountains are a frightening experience, -- to others they are a comfortable place to be."

^{27/} See, e.g., Senator Jackson's explanation of NEPA, 115 Cong. Rec. 29055 (Oct. 8, 1969); Calvert Cliffs, note 5 supra.

And, as the court put it in Calvert Cliffs:^{28/}

/T/he Section 102 duties are not inherently flexible. They must be complied with to the fullest extent. . . . Consideration of administrative difficulty, delay or economic cost will not suffice to strip the section of its fundamental importance.

In fact, at least one attempt, by the Public Land Law Review Commission, to quantify the value of wildlife on the public lands has been made.^{29/} The statement fails even to note the existence of that study, let alone adopt its methodology, with whatever qualifications would be appropriate.

Additionally, while the draft notes the tremendous increase in recreational usage of the public lands, p. 182, and the probability of increased pressure on these lands for urban expansion, p. 47, as well as recreation, it fails to quantify these needs, or to describe means by which conflicting uses will be balanced.

- 2) The Statement Fails to Explicate Fully the Decisionmaking Process Regarding Resolution of Conflicts.

The absence of quantification of values represented on the public lands makes it difficult for the BLM to resolve conflicts between private commercial uses and other values, other than on an ad hoc, subjective basis. Bare generalizations

^{28/} Note 5 supra at 1115 (emphasis supplied).

^{29/} PLLRC, Vol. 2. supra note 20.

such as "in most cases, it appears that properly managed livestock grazing and most forms of recreation which take place on BLM lands are compatible" (p. 183) are inadequate substitutes for the "finely tuned and 'systematic' balancing" required by NEPA.^{30/} Full explication of the process by which conflicts are resolved requires specific answers to the following illustrative questions: How much weight is the asserted "priority" accorded rare and endangered species (p. 42) to be given? Does the "priority" extend to forage needs only, or does it include, for example, a ban on all fencing and vegetative manipulation in areas where these practices might adversely impact endangered species? How many acres of public land have been withdrawn from domestic livestock grazing to meet habitat and/or forage needs of these or other wildlife species and where are they located? And, with respect to other public uses and values, how many acres have been withdrawn to protect "critically important" watersheds or areas of significant historic, geographical or archeological interest, and where are they located?

3) The Statement Fails to Make Full and
Accurate Disclosure of Environmental
Effects

First, neither this section of the draft, nor any other section recognizes ranchers' general lack of appreciation

^{30/} Calvert Cliffs, note 5 supra at 1786.

for the important role of predator mammals and raptor birds in assisting to maintain a natural ecological balance and the resultant illegal taking of wildlife protected by federal statutes. Moreover, the Bureau fails to acknowledge its refusal to enforce the Federal Range Code and Statutes relating to conservation of public land resources by revoking the grazing licenses or permits of private operators who violate those regulations and laws.

Second, the preliminary statement is practically devoid of any objective, scientific data to document the assertion that "intensive management" will result in the benefits claimed for it. The only specific examples of improved results are 1) the Ruby Springs Allotment, p. 2, of illustration 1, following page 26, and 2) one study showing the beneficial effects on fish following the imposition of rest-rotation grazing (p. 177). No other empirical studies showing the success of, or problems with, rest-rotation grazing on different types of soil and vegetative species are cited. As noted above, NEPA requires "full disclosure" of the environmental effects of proposed actions.^{31/} In the absence of "scientific data" to support conclusory statements^{32/}, and where there is reliance "on conclusions and assumptions without reference to supporting

^{31/} Note 2 supra.

^{32/} Lathan v. Volpe, 4 ERC 1487, 1490 (W.D. Wash. 1972).

objective data,"^{33/} the requirement of "full disclosure" is not met.

4) The Statement Fails to Balance the
Costs and Benefits of the Proposed
Action

59a-9

NEPA requires a balancing of the costs and benefits of the proposed agency program,^{34/} yet the draft as presently written ignores this requirement. In fact, the statement ignores the most straightforward element of that equation -- the total cost of instituting "intensive management". This is yet another illustration of the unreal quality of this draft -- at the very least, Congress, which will have to appropriate these monies, will want to know how much is needed and how it will be spent. How many water developments will be required, where are they located, and what are their individual and total construction costs? What is the total number of miles of fences required, where will they be located and what will they cost to construct? What will be the cost of maintaining these fences and watering facilities? What will be the cost of hiring trained personnel, of instructing graziers about this complex system, and of the "[c]lose and continuing monitoring of [each] area of land and ongoing uses [which] is a necessity." (p. 191)

^{33/} Brooks v. Volpe, 4 ERC 1492, 1496 (W.D. Wash. 1972).

^{34/} Note 6 supra, Lathan v. Volpe, note 32 supra.

These are only the out-of-pocket costs. As outlined above, NEPA requires quantification of the environmental costs of private grazing on public lands, as well as quantification of the benefits to the nation of that grazing.

VIII. "Mitigating Measures"

Again, this section confuses the present situation with the BLM's ideal future as outlined in the draft.

Bland assertions such as "[f]ences are used . . ."

(p. 189) and "water for wildlife, and bird ramps . . . are provided" (p. 190) ignore reality, since it is more often the case that they are not.^{35/}

Additionally, the draft fails to consider numerous specific measures to mitigate the adverse impact of management practices which should be employed. With respect to fences, for example, there is no provision for phasing the construction of fencing in antelope areas over several years to allow antelope to learn to cross them.^{36/}

^{35/} See, e.g., International Association of Fish, Game and Conservation Commissions, 1971, Public Land Policy Impact on Fish and Wildlife, pp. 34 (fencing),³⁵ (water developments); "Proposed Management Framework Plan for the Pinon Mesa and Baxter Pass-Douglas Pass Areas," Grand Junction District, Grand Junction, Colorado (Nov. 24, 1971), Wildlife, #2 (water developments); Range Improvements # 2 (fences); High Country News (Dec. 8, 1972) Vol. 4:24, "Sheeptight Fencing Kills Antelope," pp. 4-5.

^{36/} See PLLRC Vol. 2. note 20 supra, pp. 246-248, which also recommends other mitigating measures including the use of "antelope passes" and certain types of sheeptight fencing.

Finally, this section, as well as the entire draft, ignores the fact that fundamental policy changes should be made by the BLM to mitigate the adverse impacts of management decisions made in connection with private grazing. The Bureau should, inter alia, a) prepare impact statements in advance of all vegetative manipulation projects greater than, say, 500 acres, and any others in sensitive or otherwise significant areas; b) take steps to better inform the public of significant actions and allow meaningful participation in Bureau planning, including the preparation and circulation of EIS's on MFP's; c) make it clear that permittees and licensees who fail to comply with the Federal Range Code and federal statutes related to conservation of natural resources on public domain lands will have their livestock grazing permits or licenses revoked indefinitely; d) remove all domestic livestock from significant historic, cultural, geological and recreational areas; e) promulgate and publicize clear standards by which these areas will be identified; and f) require permittees and lessees to provide free access to public lands blocked by their private property in return for the privilege of grazing.

IX. Cumulative Effects of the Proposal
are Totally Ignored

The CEQ Guidelines require analysis of the "overall, cumulative impact of the action proposed (and of further actions contemplated)", since the effect of decisions about

a project or a complex of projects "can be individually limited but cumulatively considerable."^{37/}

As indicated above, the preliminary draft ignores this requirement with respect to both the present management program and the utopian future one it envisions.

X. "Alternatives"

This section of the draft fails completely to supply the objective, full presentation of alternatives necessary to enable either the public, Congress, or the Executive Branch to make independent judgments about their relative merits.

Alternative 2, "removal of all domestic livestock," stresses the economic impact to present permittees of such a decision, yet makes no effort to quantify that impact. Moreover, there is no suggestion as to how that impact could be minimized. Thus, it is assumed that a decision to halt grazing on the federal rangeland would have to be implemented immediately, with no concern for the welfare of the persons who would be adversely affected thereby. There is no discussion of whether the economic impact of closing the Federal range could be lessened by postponing closure for a number of years to give permittees time to adjust. In addition, there is no recognition of the fact that funds not spent

^{37/} 36 Fed. Reg. 7724 (1971) (emphasis supplied); BLM Regulations, § 1792.14(1) 37 Fed. Reg. 15017 (1972); See also Greene County Planning Commission v. FPC 455 F.2d 412, 423-24 (2d Cir. 1972).

for fencing, waterhole construction, vegetative manipulation and rest-rotation monitoring could be used for job retraining and to ease the transition period. Indeed, the statement presents no information about the permittees themselves, the size of the herds they run on the federal ranges, or how many operate from geographically isolated islands of private inholdings which, to be economically viable grazing units^{38/}, require the use of the surrounding public lands? How many of them would be unable to withstand the impact of immediate closure of the federal range without federal assistance, and how many of them are very large operators and/or agribusinesses who could afford to obtain forage from private operators at market values?

The discussion of Alternative 3, "moratorium on livestock grazing," likewise fails to quantify the costs involved, and to consider any meaningful measures which could be taken to minimize adverse economic and social impacts.

One more illustration of the draft's failure to deal with unpleasant existing realities is that the preliminary statement ignores, as an alternative to the proposed action, the continuation of the present grazing program. The statement

^{38/} The Public Land Law Revision Commission defines an economically viable ranch unit, i.e., the average size needed to cover all costs and give the rancher an adequate return on his investment, as 200 head of cattle. Public Land Law Revision Commission, Vol. 3, Summary, pp. S-56-57.

fails even to acknowledge the present system, its environmental effects including range condition and trends, and existing regulations, procedures and policies which have failed to improve the degraded condition of the public lands, and, indeed may have contributed to it.

XI. "Consultation"

NEPA procedures require the Bureau to consult with federal, state and local agencies in the preparation of an impact statement.^{39/} Page 208 of the preliminary draft statement indicates that the Bureau has consulted with several professional and conservation organizations,^{40/} but only one Federal agency (the U.S. Forest Service), one state agency (the Idaho Department of Public Lands), and two state universities - Colorado and Utah. While the list of consultants is expressly stated not to be inclusive, the BLM has an obligation to consult, at the very minimum, the Bureau of Sport Fisheries and Wildlife, the Bureau of Outdoor Recreation, the Soil Conservation Service, the Bureau of Reclamation, every state fish and game department of the 11 western states, and all state agencies responsible for recreational, archeological, geological and historical matters to insure that the

^{39/} 42 U.S.C. § 4332(2)(C); Ex. Ord. No. 11514, §§ 2(a), 2(f), 35 Fed. Reg. 4247 (1970); CEQ Guidelines § 9, 36 Fed. Reg. 7724 (1971).

^{40/} The Natural Resources Defense Council is listed as being consulted. We hope our experience is not representative. Although we have requested impact statements on several Bureau practices in a number of letters, and have even described what information they should contain, (see, e.g., attached letter, dated January 8, 1973), we were not consulted at all regarding the content or organization of this draft.

concerns of each are reflected in the statement.

XII. Conclusion

In conclusion, note must be made of the general bias of the preliminary draft: 1) The introduction states that "The basis for the programmatic statement, is that grazing animals are an integral part of the range ecosystem." (page i). Although the preliminary draft purports to recognize that domestic animals are a relatively recent addition to range ecosystems, this statement, and others like it,^{41/} imply that livestock and wild herbivores have an equivalent place in those ecosystems. Yet, in fact, the latter are the only grazing animals that are an integral and natural part of the range environment. Since the introduction of domestic animals, wild herbivores have been displaced and many species are extinct or endangered, or have populations that are far below levels found before.^{42/}

2) The draft states "[s]pecific actions such as land treatment practices or range conversion projects are treated

^{41/} See, e.g., p. 202: "Perhaps the most undesirable aspect of livestock removal is that it eliminates a natural component . . . (emphasis supplied).

^{42/} See, e.g., Morgan, James K., Ecology of the Morgan Creek and East Fork of the Salmon River Bighorn Sheepherds and Management of Bighorn Sheep in Idaho (Idaho Fish and Game, September, 1970).

in separate environmental impact statements" (p. 2, emphasis supplied). In fact, EIS's have not yet been prepared on any range conversion projects, although NRDC has repeatedly requested them.

3) In addition, the procedures governing chemical and mechanical vegetative manipulation and the environmental impacts of manipulation projects should be treated in any statement on BLM range management, rather than dealt with in a separate statement. Manipulation and grazing are integral parts of the same management program, and their cumulative impacts should be considered together. Approximately one-million acres of public land have been sprayed with herbicides or chained, and most of these were re-seeded, principally with crested wheatgrass, to provide forage for domestic livestock.

4) Although the general thrust of the draft is that grazing of the public lands ~~is~~ required, in fact the Taylor Grazing Act authorizes grazing only where it is the highest and best use of the land involved. The existence of conflicts between grazing and other uses of these lands, as well as the present abused condition of much of the public range, suggests that in many areas grazing is not the best use.

5) Finally, at p. 185 of the draft, it is asserted:

In times past, before the advent of intensive grazing management, it seemed that livestock grazing was detrimental to recreation. But, today, with intensive grazing management, the increasing numbers of recreationists pose more problems to livestock grazing."

Not only does this assertion lack sufficient elaboration, it ignores the important fact that "intensive management" with its requirement of extensive fencing, will make it more difficult than ever for recreationists to use and enjoy the public lands. In fact, "intensive management" suggests management for a single use, grazing of domestic livestock. This trend should long ago have been reversed. It is time that more than "lip service" be paid to managing the lands for multiple uses in the interests of the entire public, present and future.

APPENDIX A

Natural Resources Defense Council, Inc.

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January 8, 1973

Mr. Burton Silcock, Director
Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Dear Mr. Silcock:

We at the Natural Resources Defense Council (NRDC) look forward to publication of the Bureau of Land Management's long-awaited and long-overdue environmental impact statement on its grazing program for the public lands. We trust that the statement will treat grazing and reasonable alternative uses of BLM lands, such as recreation, wildlife habitat and forage, and reservations of areas of special scenic, geological or historical interest, with adequate objectivity and detail to provide a base for informed decision-making. In this letter, we want to emphasize our view that the National Environmental Policy Act (NEPA) requires not only a general programmatic statement on grazing and its alternatives, but also a detailed statement of the impacts of grazing and the suitability of alternatives from locale to locale.

Although a general statement is vital, informed decisions to issue and renew permits allowing either more or less grazing necessarily require knowledge of the specific impact of that grazing, and the impact will vary with the grasses, soils, climate, water resources, recreational, wildlife, and other values of the area grazed. The local administrative units of the BLM which make local resource analyses at present to aid them in decisions on planning and on specific permit renewals would presumably be the appropriate BLM offices to prepare these detailed local environmental statements (or elements of national statement). NRDC is preliminarily of the view that detailed statements by each of these local BLM offices could be sufficient to comply with NEPA and, if adequately done, could be sufficient to avoid the necessity of statements prepared for each permit.

As you are aware, section 102 of NEPA requires federal agencies, including the BLM, to promote "to the fullest extent possible" the goals of environmental protection as expressed by the Act. Calvert Cliffs Coordinating Committee, Inc. v. Atomic Energy Commission, 449 F.2d 1109 (D.C. Cir., 1971), 2 E.R. 1779, 1 E.L.R. 20346. To ensure that ecological factors are fully considered and adverse environmental effects are minimized, the section requires preparation of a detailed environmental statement (EIS) which must discuss, inter alia, "the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity." NEPA, § 102(2) (C)(iv) (emphasis supplied). The purpose is to disclose to the public and to decision-makers, including the President and Congress, all possible environmental consequences of the grazing program and reasonable alternatives to that program. Environmental Defense Fund v. Corps of Engineers, 325 F. Supp. 749 (E.D. Ark., 1971), 2 E.R. 1260, 1 E.L.R. 20130.

The President's Council on Environmental Quality, responsible for overseeing and guiding the EIS preparation process, has recognized that programs, such as grazing, include elements which are local and must be considered in detailed statements on specific areas and projects as well as elements which may be meaningfully considered in a general national statement. Section 10 of the CEQ Guidelines provides:

"It will often be necessary to use the [EIS] procedures both in the development of a national program and in the review of proposed projects within the national program."

A recent memorandum from the Council on Environmental Quality elaborates this concept pointing out that one of the functions of a broad, programmatic EIS is to avoid "duplicative reconsideration of basic policy questions" and that narrower statements dealing with specific local impacts are necessary where, as is the case with the grazing program, "all significant issues cannot be adequately treated in connection with the program as a whole." Memorandum from Council on Environmental Quality to Federal Agencies on Procedures for Improving Environmental Impact Statements, May 16, 1972, reprinted in 3 Environment Reporter (BNA), Current Developments, May 19, 1972, at 82-87.

Environmental impact statements at the unit level are required because the grazing program administered by the BLM involves 157,391,645 acres of publicly-owned land of widely different topographical and geographical characteristics. Each

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A recent memorandum from the Council on Environmental Quality elaborates this concept pointing out that one of the functions of a broad, programmatic EIS is to avoid "duplicative reconsideration of basic policy questions" and that narrower statements dealing with specific local impacts are necessary where, as is the case with the grazing program, "all significant issues cannot be adequately treated in connection with the program as a whole." Memorandum from Council on Environmental Quality to Federal Agencies on Procedures for Improving Environmental Impact Statements, May 16, 1972, reprinted in 3 Environment Reporter (BNA), Current Developments, May 19, 1972, at 82-87.

Environmental impact statements at the unit level are required because the grazing program administered by the BLM involves 157,391,645 acres of publicly-owned land of widely different topographical and geographical characteristics. Each

BLM administrative unit encompasses widely different resource values. To accomplish the aims of NEPA, and to achieve environmental full disclosure, information about particular local conditions, resource values, and needs must be provided. Absent such information, persons removed from the actual decision-making process will be unable to evaluate the degree to which national policies and decisions are carried out at the local level. Nor will they be able to balance for themselves the competing values involved in local decisions to continue to allocate certain lands for grazing rather than to withdraw them for watershed or recreation purposes for example, or to permit domestic livestock on geographical areas never before so grazed. Every such decision has a significant ecological impact on the public lands involved. To date, virtually all of these local decisions have been made without participation of, or response from, the general public, from Congress, and the President. NEPA, however, mandates a termination of this type of closed-door decision-making, and requires instead full disclosure of the specific impacts and reasonable alternatives which might minimize them.

Compliance with NEPA will not impose an intolerable administrative burden on the Bureau inasmuch as yearly unit resource analyses are already required of local BLM offices. The law, however, is not satisfied by requiring interested members of the public to travel to local offices to inspect such analyses.

We are eager to have an adequate environmental impact statement on the grazing program at the national and local levels. If we can be of any assistance, do not hesitate to contact us.

Sincerely,

John E. Bryson
Johanna H. Wald

JEB:gen

cc: Russell E. Train
Timothy B. Atkeson
William D. Ruckelshaus
Rogers C. B. Morton

Key No.

- 59a-1 It is beyond the role and authority of the BLM to guarantee the funding essential to accomplish intensive management on the NRL.
- 59a-2 The presentation of data relative to range conditions (see Tables I-5 and III-1 of the EIS) portrays the existing situation on the NRL. No "public relations" is intended.
- 59a-3 The livestock grazing program is authorized under regulations adopted pursuant to the Taylor Grazing Act. Decisions made regarding this authorized use are a matter of public record.
- 59a-4 See response to comment 59-3 concerning the purpose and scope of the programmatic statement.
- 59a-5 The statement discusses environmental impacts of livestock grazing as it affects other resource values. It is not the purpose of this EIS to cover all resource programs conducted on the NRL.
- 59a-6 Cost-effectiveness analysis rather than cost-benefit is commonly more appropriate when considering resource programs. For example, the conservation of soil may be in the national interest regardless of cost; but the most effective procedure for conserving soil at least cost would be evaluated. Also, it is not appropriate to equate costs solely against beef and wool produced. There are other tangible and intangible benefits which must also be included in any economic analysis.
- 59a-7 References providing detailed treatment of research done on exclosures is included in the listed citations of published literature.
- 59a-8 Although the Final EIS is the product of several years of Bureau effort, it cannot be said BLM has not been responsive to NEPA. Preparation of the EIS began in April 1971. The delay in publication of the Final EIS is the result of consultation and coordination with individuals, groups, organizations and Federal and state agencies. Also, the procedures for in-house review are time consuming and create delays in addition to those caused by financial and manpower constraints. However, Bureau policy requires an environmental analysis of proposed allotment management plans and supportive measures developed in conjunction with the livestock grazing program. Hundreds of such environmental analyses have been prepared with appropriate considerations made for environmental impacts during the period in which the EIS was being developed.

Key No.

Key No. 59a

59a-9 The EIS describes quantitatively where possible (and qualitatively where data are not available) the environmental costs and benefits of the program as required by CEQ guidelines.

COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT
LIVESTOCK GRAZING ON NATIONAL RESOURCE LANDS
BY
NEVADA CATTLEMEN'S ASSOCIATION
NEVADA WOOLGROWER'S ASSOCIATION
CENTRAL COMMITTEE OF NEVADA STATE GRAZING BOARDS

This Draft Environmental Statement is deficient in that it does not adequately or accurately present the following considerations:

- 60-1 1. The improvement to the National Resource Lands (NRL) in Nevada that has occurred under the Taylor Grazing Act from 1934 to the present as a result of the joint efforts of the BLM personnel and the ranchers in the management, grazing and improvement of the NRL in the Nevada areas. Great improvements in the NRL can be seen as a result of expenditures of large sums of money by the ranchers and managed utilization of this resource. It is an inaccurate and harshly unrealistic statement to state that there is a declining condition of millions of acres of rangelands caused by widespread overgrazing.
- 60-2 2. The adverse impact on the national and world's supply of meat and fiber if grazing is eliminated or reduced on the NRL and the priority that must be given to food production to meet the growing world food scarcity. NRL presently feed 1.7 million head of cattle and 1.0 million head of sheep. Any program which would fail to fully utilize the available grazing would be wasteful of a natural resource that is needed in meeting the demands for food. Government agencies are presently developing programs and policies aimed at population control through childbirth control to ease the existing food shortages and to meet the forecast of future food demands. Such invasion of the private rights of individuals to produce heirs should not even be considered so long as any food producing natural resource is not being fully utilized to its maximum capacity.
- 60-3 3. The adverse economic impact upon small livestock communities and counties located in areas in which the ranches, such as in Nevada, are totally dependent upon the availability of NRL for grazing to continue their ranching operations.
- 60-4 4. The adverse impact upon the uses and availability of private lands and upon the availability of grains and livestock feeds that would result from intensified pressures upon these resources should grazing be curtailed or eliminated from the NRL.

- 60-5 5. The adverse impact upon NRL caused by overgrazing by an over-population of what is referred to as "wildhorses" and "wild burros". In Nevada we are experiencing adverse impacts upon the NRL from a rapidly increasing herd of unmanaged horses and burros and the absence of herd and number management.
- 60-6 6. The fact that in Nevada, ranches, counties and communities are dependent upon the availability and use of NRL, since 87% of our State are NRL.
- 60-7 7. The adverse impact upon the Indian minority groups in the Nevada areas who own or operate ranches and are dependent upon the availability of grazing on the NRL.
- 60-8 8. The impact of NRL grazing upon the energy crises. It requires less energy to produce meat and fiber upon the NRL than through the intensive development, irrigation and farming of private lands and the intensive feeding of livestock feeds in feedlot developments.
- 60-9 9. The impact of NRL grazing upon the existing fertilizer shortage. Little fertilization is required or used on NRL to produce the grazing resource. However, should the number of livestock being grazed upon NRL be reduced they will have to be moved to private lands. Before this can be accomplished the productivity of the private lands must be intensified which would involve a substantially increased demand upon an already short fertilizer supply. This in turn could reduce the availability of fertilizers for the production of other foodstuffs in other farm areas.
- 60-10 10. The fact that grazing utilizes a renewable resource which has been utilized for centuries by wildlife and livestock, which use has improved the range, resources and NRL.
- 60-11 11. The aesthetic impressions of livestock grazing upon the NRL. Livestock grazing, cowboys, branding, cattle herds, sheep camps, ranch buildings, etc., are all a part of the traditional American West. They are part of the heritage of our nation and should not be destroyed. The tradition of the "old west" is currently popular with a great many Americans as is evidenced by current trends in clothing, hair styles, beards, mustaches, etc.. A great many tourists are attracted to Nevada for the experience of seeing livestock grazing on the NRL and to come into touch with the West. Many foreign students, foreign dignitaries and agriculturists from around the world have visited Nevada for the express purpose of seeing the western style ranching operation in operation and livestock grazing upon the NRL. It is a form of recreation, education and historical enjoyment.
- 60-12 12. The fact that livestock grazing is the most effective and most economic form of fire control. Ungrazed NRL in a Nevada

- 60-12 (cont.) area pose a constant summer fire threat to communities, ranchers, wild-
life and people using or enjoying the NRL. The elimination of grazing
around campgrounds, homesites, timberlands, wilderness areas and other
NRL areas increases the hazard of loss to these developments and the
individuals using them, through fire. Without grazing of livestock it
would be necessary to increase the budgetary expenditures for fire-
fighting equipment and crews. Grazing is a natural form of enhancing
the health, welfare and safety of persons on or in the vicinity of
NRL.
- 60-13 13. The impact of cyclic phenomena upon the NRL and the
overstatement in the draft that millions of acres are overgrazed. The
forces of mother nature make it impossible to have an absolutely stable
rangeland or NRL condition. All forage and uses are effected by drought,
flood, freezing, fire, deer and other wildlife herd increases, wild
horse and wild burro increases, rodent epidemics, insect plagues and
disease epidemics.
- 60-14 14. The impact of government management policies and prac-
tices upon the NRL and the use of that land by all resource users.
- 60-15 15. The impact of government rules, regulations and
policies upon the economics and financial strength of the rancher, and
the beneficial impact upon increase in grazing and the detrimental
impact upon decrease or elimination of grazing.
- 60-16 16. The impact of grazing fees upon the economics of the
rancher and the impact of the market value of livestock upon the
rancher's ability to pay grazing fees and to fund range improvements
upon the NRL.
- 60-17 17. The disparity between money contributions made for use
of the NRL by livestock grazers through grazing fees and range improve-
ments and other users of the NRL, and the elimination of these contri-
butions by the ranchers.

NEVADA CATTLEMEN'S ASSOCIATION

BY Ira H. Kent
IRA H. KENT, PRESIDENT

NEVADA WOOLGROWER'S ASSOCIATION

BY DeLoyd Satterthwaite
DELOYD SATTERTHWAITE, PRESIDENT

CENTRAL COMMITTEE
NEVADA STATE GRAZING BOARDS

BY Roy Young
ROY YOUNG, CHAIRMAN



Key No.

- 60-1 See item 2, page IX-6 of the EIS.
- 60-2 Continuation of the present program will not result in the reduction of animal unit months of forage available on national resource land. See Table I-8, page I-16 of the EIS.
- 60-3 Individual county analysis is beyond the scope of this statement; however, in the EIS, Tables II-E-1 and II-E-2 (page II-E-2) in the last line of each table give an indication of the relative impact of NRL grazing in counties of the 11 Western States.
- 60-4 The U.S. is expected to be a major exporter of coarse grains (live-stock feed) over the period considered (see Don Paarlberg; "The World Food Situation in Perspective:" Am. J. of Agr. Econ.; May 1974). The amount of AUM's supplied by the NRL converted to feed grain equivalent could not be expected to significantly alter a situation where 1985 production for domestic and export use is expected to be 233 million tons with a total potential to produce 315 million tons.
- 60-5 BLM recognizes the rate of increase of wild horses and burros on national resource land. However, as Table I-8 of the EIS indicates based on present policy and available data, it is not the intent of the Bureau to increase wild horse and burro populations above the estimated numbers that existed at the time PL 92-195 was enacted in 1971. As data on wild horses and burros are refined and management plans are adopted the problem of increased numbers of wild horses and burros will be confronted.
- 60-6 In keeping with the use of biomes as the basic geographic unit for environmental description, no individual state or community has been singled out for separate analysis. Nevada is included in the desert biome and the great basin sub-region (see pages II-52, II-53, III-35 and Appendix Tables III-A-1 and III-A-2). It is true that Nevada has a higher dependency on NRL than any other western state.
- 60-7 The livestock grazing management program is administered through regulations promulgated under the Taylor Grazing Act. The program, as discussed in the EIS, will impact Indian minority groups to an extent similar to that which other qualified users are affected. Intensive grazing management should benefit all authorized users who are qualified to graze livestock on the NRL. As mentioned in the text, individual operations may be affected in those rare instances when higher land use priorities preclude livestock grazing.

Key No.

- 60-8 Recent research by Eric Hirst^{1/} of Oak Ridge National Laboratories shows that energy use per unit of food energy--sweets, fats and oils, flour and cereals and fresh vegetables are all very energy efficient. By comparison, dairy products, meat and poultry, fresh fruits, fish and processed fruits and vegetables are relatively inefficient.
- USDA researchers point out that production of livestock on a range basis requires lower energy input from fossil fuel sources than do production systems heavily dependent upon feed grains.^{2/} This would hold if grass fed yearlings or two year olds were compared with the same classes in feedlots. However, it does not necessarily follow that cow-calf operations expanded by range improvement are more energy efficient per pound of production than feedlot operations since they reflect different stages in the production process.
- 60-9 The impact of NRL grazing upon the existing fertilizer shortage would be negligible. For example, Nevada's total nitrogen fertilizer consumption in 1973 was 8,600 tons, about .1 percent of total U.S. nitrogen consumption (8.3 million tons). Water needed for utilization of additional nitrogen to irrigated meadows or pastures would be the more limiting factor in the arid West.
- If more of our available land (in humid and sub-humid regions) were used to produce the food and fiber in 1980, fertilizer requirements could be reduced since land and fertilizer substitute for one another to a limited extent (although more expensive).
- Given current and projected price relationships for fertilizer and foodstuffs, it is questionable that private lands in the West could compete for fertilizer to grow additional hay, pasture or forage crops. Thus the threat of their reducing the availability of fertilizers for the production of other higher valued foodstuffs in other farm areas is rather hollow.
- 60-10 The EIS is based on the scientific knowledge that vegetation is a renewable resource and proper livestock grazing will improve that resource.
- 60-11 It is agreed that livestock grazing has positive aesthetic values for many people. See page III-42 of the EIS.

^{1/} Hirst, Eric, Energy Use for Food in the United States. Oak Ridge, Tennessee. Oak Ridge National Laboratory. ORNL-NSF-EP 57. October 1973.

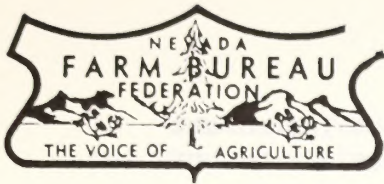
^{2/} USDA, Opportunities to Increase Red Meat Production from Ranges of the United States.

Key No.

- 60-12 See page I-3 of the EIS. Proper livestock grazing is a very effective tool for reducing fire hazards by utilization of the forage. However, over-utilization of high quality native vegetation by livestock in some areas has resulted in an invasion of undesirable annual grasses and forbs that have increased the fire potential because they mature early in the season and become hazardous fuel types. An example is "cheat-grass" a short-lived annual grass common to the Rocky Mountain states.
- 60-13 National resource lands are subject to cyclic phenomena, many of which are due to the vagaries of nature beyond the control of man. Resource managers recognize these limitations and realize that their very best management efforts may be affected by circumstances beyond their control. Grazing by domestic livestock is under the direct control of the resource manager, however, and is an almost universal use of rangelands worldwide. The essence of the EIS is that this universal use can be managed to provide not only additional forage for livestock but many other multiple use values as well, all within the constraints of the climate and other environmental influences. The EIS is limited to a discussion of the impacts of livestock grazing on the environment. To attempt to discuss how forage and other uses are affected by drought, flood, freezing, fire, rodents, etc., is beyond the scope of this EIS.
- 60-14 The impact of government policy and practices on NRL, and the use of that land by all resource users certainly must be considered in measuring the overall impact on NRL. However, the purpose of this EIS is to assess the impact of livestock grazing.
- 60-15 The total legal structure under which the NRL are administered has been built over time and in response to a variety of users, interests and national goals. The greatest impact of this structure on the financial strength of ranchers probably lies in the tenure aspects of grazing permits. According to the Public Land Law Review Commission Report, January 1970, lending agencies discount lease and permit values at least 40 percent from an equivalent grazing capacity on private land.
- 60-16 The formula by which grazing fees are determined is based upon a fair market value concept for range feed. Any impact of these fees upon the rancher is no different than similar price changes occurring in other forage-feed sources.
- 60-17 BLM recognizes the rate of increase of wild horses and burros on national resource lands. However, as Table I-8 of the EIS indicates based on present policy and available data, it is not the intent of the Bureau to increase wild horse and burro populations above the estimated numbers that existed at the time PL 92-195 was enacted

Key No.

60-17 in 1971. As data on wild horses and burros are refined and manage-
(cont.) ment plans are adopted the problem of increased numbers of wild
horses and burros will be confronted.



Nevada Farm Bureau Federation

1300 MARIETTA WAY

• SPARKS, NEVADA 89431 • PHONE (702) 358-7737

July 10, 1974

Honorable Curt Burkeland, Director
Bureau of Land Management
Interior Building
Washington, D.C.

Dear Director Burkeland:

The Nevada Farm Bureau Federation is appreciative of this opportunity to comment to you on several aspects of the Programmatic Environmental Impact Statement with the objective, hopefully, of having its policies incorporated in the EIS draft.

The Nevada Farm Bureau consists of 2,600 farmer-rancher family members. Many of them are engaged in the cattle raising industry and, inasmuch, as 87 percent of the Nevada landmass is under federal control - 68 percent under BLM - the economic importance of grazing on public lands is paramount to them and their communities.

But their opinion is based not only on the value to them of public land grazing but on the showing by several surveys by scientific bodies that cattle grazing, with the attendant improvements made by the cattlemen, is of benefit to the multiple use of our public lands and contributes to the well-being of wildlife.

Before going into some of the specifics of our policy, I would like to quote from two rangeland studies. These were made by the Council for Agricultural Science and Technology and the United States Public Land Law Review Commission.

The review of EIS for the Council for Agricultural Science and Technology was made by a task force consisting of members representing the top people in range management and contributing areas of related disciplines in the academic community. On page 2 of the introduction to their report are the following two statements:

61-1 "In our view, production of food and fiber for human use is the most valuable use of many Federal lands, but it is not the only legitimate use, and it is not appropriate under some circumstances." The Draft Environmental Impact Statement, however, argues that other uses are more important than producing food and fiber and implies that production of food and fiber has detrimental impacts on those other uses.

61-2 And, "We believe, and shall attempt to explain, that the BLM Draft Environmental Impact Statement is biased against livestock grazing. This review of the BLM document is intended to provide constructive criticism of the implied viewpoint against livestock and of numerous doubtful statements intended to convey factual information about the impacts of grazing."

The Public Land Law Review was a multi-million-dollar study in which the Commission outlined nine major range recommendations, plus fifteen sub-recommendations for a rangeland program.

An important finding was that the federal rangelands were improving and that livestock grazing was not only beneficial to the lands but also constituted a vital rangeland management tool. It was also revealed in this study that 73 percent of the federal rangelands could be substantially improved if intensive management were provided and that a 76 percent increase in the aums (animal unit months) harvested each year was achievable.

This finding of the PLLR Commission relative to the potential public benefits for range improvement were substantiated in 1971 by a team of Utah State University range economists in their study: "The Importance of Renewable Grazing Resources on Federal Lands in the Eleven Western States."

In a statement before the Public Lands Subcommittee of the House Interior and Insular Affairs Committee in Salt Lake City, Utah, March 30, 1974, it was emphasized the importance of agriculture in the economy of Nevada and that many ranching operations involve both private and public lands and the private operations could be reduced in value or destroyed if grazing is eliminated. I recalled that the use of public lands by livestock is important to our nation's food and clothing needs. Meat, wool and other livestock products, are provided for our growing population by having the use of the resources of public lands.

And, as you know, the export of agricultural products provided the United States last year a favorable trade balance.

While the EIS has included much useful data on the grazing of natural resources lands and its effects on wildlife, recreation and other multiple uses, we believe it could be reinforced and the situation become more definitive if additional data in the following areas were included.

61-3 The importance of the effect private livestock grazing has
on the rehabilitation, continuation and perpetuation of rangeland
through the work, improvements, maintenance and servicing of
61-4 existing water stations by stockmen and their cowboys and how this
benefits wildlife. Conversely, how harmful it would be to wildlife
habitat if livestock grazing were not permitted.

61-5 An estimate of the cost to the federal government if it were
to lose not only those contributions to the improvement of range-
lands but the imput the cattle industry makes in fire fighting,
rescue, emergency field service and general information service to
the visiting public.

61-6 More information should be made available on the cattlemen's
investments in predator management programs, the damage to capital
investments on private lands that depend also on federal land
grazing, and the damage that can arise on rangelands if grazed only
by wildlife.

Agriculture is the third most important industry economically in Nevada, and the NFBF membership represents the range livestock industry in the state and has a deep concern in this situation due to their dependency on federal ranges for feeder cattle and sheep. These members also produce hay and feed grains that are sold to range livestock enterprises. And our members' concern extends also to management of federal lands as watersheds from which 61 percent of the water resources of public land states arise.

Our members realize the importance of the pending court action. We support a program of multiple use and we believe the wildlife habitat, general recreation, watershed benefits and domestic livestock grazing can be enhanced and grow and improve side-by-side. The food and fiber productions from these federal land resources are a vital link in the livestock process.

61-7 For these reasons, we respectfully suggest additions of supportive documentation of the points mentioned as economic benefits that would be incurred or lost to the general public if domestic livestock grazing of the National Resources Land were not maximized.

We appreciate this opportunity to outline to you the beliefs, policies and opinions of our Nevada members.

Sincerely,



Charles L. White
Executive Administrator
NEVADA FARM BUREAU FEDERATION

Key No.

61-1 The EIS does not argue on behalf of any use that could be made on national resource lands.

It is not the intent of the EIS to contend that other uses are more important than producing food and fiber. In fact, the statement that the Bureau estimates 140 million acres of NRL suitable for livestock grazing and that the number of animal unit months through the present program will increase by 3.5 million AUM's does not support the reviewer's comment.

61-2 See item 1, page IX-5 of the EIS.

61-3 See item 4, page IX-7 of the EIS.

61-4 The merits of proper livestock grazing practices are not questioned. The adversities of livestock grazing usually result from improper management. Many range improvements for livestock grazing are also beneficial to wildlife. The importance of these improvements to wildlife is described in the EIS.

61-5 The economic contribution referred to is not pertinent to the subject of the environmental impact of livestock grazing on national resource land.

61-6 The overall impact of the management program on private capital would probably be to increase the private investment level (see page I-10 of the EIS). The alternative of "no grazing" would have negative impacts on private capital as explained in item 18, page VIII-9 of the EIS. The amount of private investment in predator control is unknown, but such investments are usually of a short term nature. Dependent on what kind of herbivore (either wild or domestic) grazes the rangelands, changes in vegetative composition may occur which may be adverse or favorable depending on a particular viewpoint.

61-7 See response to comment 36-2 on the subject of benefits foregone by failure to maximize livestock grazing.



New Mexico Cattle Growers' Association

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TELEPHONE 247-0584

ALBUQUERQUE, NEW MEXICO 87104

June 5, 1974

Honorable Rogers C.B. Morton
Secretary of the Interior
Washington, D.C.

CHARLIE T. LEE, PRESIDENT
ALAMOGORDO

JIM G. BROWN
EXECUTIVE SECRETARY
ALBUQUERQUE

ALBERT J. MITCHELL
FIRST VICE PRESIDENT
ALBERT

BOB JONES
VICE PRESIDENT
DELL CITY

OLIVER 'SATO' LEE, JR.
VICE PRESIDENT
HORSE SPRINGS

SAM MOORHEAD
VICE PRESIDENT
ROSWELL

PHIL HARVEY
SECRETARY-TREASURER
CARRIZOZO

SUBJECT: Draft Environmental Impact Statement on Livestock
Grazing on National Resource Lands.

Dear Sir:

By reading the Impact Statement in conjunction with the BLM Organic Act (HR 5441), pending in Congress, and attending agency planning unit hearings in various districts; it becomes apparent that the agency desires to greatly reduce livestock grazing in all western states. This is evidenced by the stated intent in the impact statement of withdrawing 10 million acres from livestock use.

The Environmental Impact Statement, made available to the public on April 11, 1974, should be withdrawn and corrected.

We take extreme exception to this document for the following reasons:

- 62-1 1. The livestock grazing program has no specific objectives. We have no congressional policy contrary to the Taylor Act objectives; therefore this grazing program, if implemented, would destroy the economy of the nation's western livestock industry and the future red meat supply of our nation's consumers. Additional reductions in livestock grazing will be made where grazing conflicts with recreational uses.
- 62-2 2. The significance of public lands grazing in its relationship to the economic effect on county and state government; should be reexamined and corrected to reflect all factors; including a fee structure having a differential for yearlings to remove the financial penalty of a more flexible operation.
- 62-3 3. Explanation of, and the impact of, the reduction of grazing by 10 million acres, and the apparent elimination of large numbers of grazing permittees should be made. Full consideration must be given to the effect of BLM management decisions upon the State and private owners of intermingled lands, who may have different goals.
- 62-4

Sincerely,

Charlie T. Lee

Charlie T. Lee
President

NEW MEXICO CATTLE GROWERS' ASSOCIATION

Comments On
Draft Environmental Impact Statement
Livestock Grazing on National Resource Lands

This draft statement was made available to the public on April 11, 1974. It describes, in very general terms, the livestock grazing program and policy, alternatives considered, and some environmental impacts of each. Basic legal authority for management action on National Resource Lands, for most uses, is contained in four primary acts; subject to environmental considerations mandated by the National Environmental Protection Act. The major act is the Taylor Grazing Act, which sets Congressional policy. The policy indicated is that the Secretary of Interior (BLM) determine which of the lands are chiefly valuable for grazing and growing forage crops and administer them in such a way as to protect them from injury, provide for orderly use, improve and develop the range, and stabilize the dependent livestock industry. Range improvement, in this context, clearly meant for livestock use. There is no authority for most wildlife management in that the wildlife are the property of the states, generally. Most commercial uses may be managed, while non-commercial may not, except in the context of preventing injury to the lands or resources. In the absence of direct Congressional policy, BLM has developed policies which are found, primarily, in the Bureau Manual; and secondarily in regulations which the manual supposedly interprets.

The statement describes the Bureau program for grazing management which has been in the process of implementation for several years. It consists of examining the resources, determining suitability for grazing, and developing a plan for manipulation of grazing use which it is hoped will ultimately produce a desired range condition. Range condition does not necessarily mean either livestock range or wildlife range or a combination. It is stated that the key is the physiological needs of the vegetation. The current environment is very loosely described. The description contains glaring inaccuracies. Various impacts of the selected program are described, but with significant omissions. Four alternative programs and their impacts are described. Neither a purely custodial program nor the elimination of grazing is a viable alternative, even if it were legal. Both remaining alternatives, maximizing grazing and accelerating the present program contain the same flaws as the selected program in that they are both totally dependent upon the success of the Allotment Management Plan system which sets goals and uses the livestock operation as a tool for accomplishment. Unless the goal and the means for attaining it are acceptable to the

individual permittee, the AMP will be unsuccessful. The selected plan predicts that some 140 million acres will be grazed out of 171 million subject to consideration for grazing. This is 10 million less than are presently grazed. About 7 million acres are in tracts too small to manage, which leaves some 133 million either now under or subject to an AMP. There are presently about 22,000 operators who hold 24,000 licenses, permits, or leases. About 15,700 of these permits are within grazing districts and it must be assumed that this will be the location of most AMP's. It is stated that there is need for about 8230 AMP's and that all 133 million acres will be covered. There is no explanation of the difference between 15,700 permits and 8230 AMP's, except that 10 million acres will be removed from grazing. It would appear that there will be a significant reduction in the number of ranch operations, forced partnerships, or elimination of permittees. There is no satisfactory explanation or discussion of impact.

62-5 Many of the conclusions in the statement are based upon incomplete, misunderstood, or misinterpreted information. AUM's of forage are calculated from the number of head reported by the permittees (animals over 6 months of age) times the number of months on the range. Since the majority of permittees are breeder operators, and calves are weaned and sold by six months of age, they never appear in the calculation. They go to feed lots and are a very significant factor in the nation's meat supply. The statistics do not consider a very important part of federal grazing. Livestock must have a "home" for the entire year. In many cases even a 30-day grazing season is the key to a yearlong operation. The forage quality may have little food value and the animal may lose significant weight for a time, but the grass used as a filler with protein supplement will keep her alive. Statistics would indicate that AUM's of federal forage bear a certain relationship to total forage requirements in an area, therefore that relationship is the total impact on livestock production. To show the other side of this reasoning, assume that all livestock in an area use federal forage 10% of the time. Loss of this 10% would mean no feed for more than a month and the livestock would die, so the impact would be 100% rather than the 10%. This reasoning is no more invalid than the previous. It is almost literally true in the water base, yearlong areas due to the intermingled land ownership pattern. There is no alternative to federal forage. In the seasonal areas, the impact is not quite as great. These impacts must be understood and considered before valid management decisions can be made.

The selected plan has the primary objective, the improvement of watershed conditions with the key to attainment being providing for the physiological needs of the vegetation. The heart of the program is the Allotment Management Plan, with the manipulation of livestock grazing being the primary tool. It is indicated that one of the objectives in many cases is a basic change in the plant community. There is no definition as to what ultimate standard the range is to be brought, what the vegetation mix might be, nor the degree of harvest which might be allowed. The options are great and so are the impacts. Using livestock as a tool, the rate of change is slow and great problems can gradually appear -- too late for the permittee to react. Range condition through range management are primary concerns. The livestock operator is primarily concerned with ranch management which must consider range only as one of the elements of making a living for his family. Too great a preoccupation with range can break him. The only real interest the land manager has in ranch management is to utilize the permittees' livestock as a tool for achieving range condition. The result can be a controlled economy for the livestock operator and this impact is not treated. When range is the primary consideration, a great many management options of the permittee are preempted.

It must be understood that livestock operators have objectives and plan toward attainment. In this process they have committed huge amounts of resources, both human and monetary. As of 1969, on the basis of original cost, Sec. 4 and Sec. 15 improvements amounted to \$25,647,942. This does not include incalculable amounts in small actions such as erosion dams, etc., which were not, at the time, worth the paper work. 61% of these funds were spent in 3 states which are largely water base-yearlong.

62-6 The land pattern is intermingled, with most water situated on non federal land. (The homesteads and state selections were set down on the basis of water availability and superior resource value.) The statement does not adequately treat the impact upon management choices of the intermingled state and private owners or the impact upon federal programs of the management choices by non federal landowners. The program assumes correct, infallible management and does not treat the consequences of imposed unwise actions.

Whether it be ranch or range management, either is an art and requires a deep and intimate understanding of a particular environment. No two practitioners make the same choices at the same times and conditions. No set procedure can produce the results gained by a good manager who may or may not use "scientifically accepted" procedures. There is simply no substitute for good judgement.

individual permittee, the AMP will be unsuccessful. The selected plan predicts that some 140 million acres will be grazed out of 171 million subject to consideration for grazing. This is 10 million less than are presently grazed. About 7 million acres are in tracts too small to manage, which leaves some 133 million either now under or subject to an AMP. There are presently about 22,000 operators who hold 24,000 licenses, permits, or leases. About 15,700 of these permits are within grazing districts and it must be assumed that this will be the location of most AMP's. It is stated that there is need for about 8230 AMP's and that all 133 million acres will be covered. There is no explanation of the difference between 15,700 permits and 8230 AMP's, except that 10 million acres will be removed from grazing. It would appear that there will be a significant reduction in the number of ranch operations, forced partnerships, or elimination of permittees. There is no satisfactory explanation or discussion of impact.

62-5 Many of the conclusions in the statement are based upon incomplete, misunderstood, or misinterpreted information. AUM's of forage are calculated from the number of head reported by the permittees (animals over 6 months of age) times the number of months on the range. Since the majority of permittees are breeder operators, and calves are weaned and sold by six months of age, they never appear in the calculation. They go to feed lots and are a very significant factor in the nation's meat supply. The statistics do not consider a very important part of federal grazing. Livestock must have a "home" for the entire year. In many cases even a 30-day grazing season is the key to a yearlong operation. The forage quality may have little food value and the animal may lose significant weight for a time, but the grass used as a filler with protein supplement will keep her alive. Statistics would indicate that AUM's of federal forage bear a certain relationship to total forage requirements in an area, therefore that relationship is the total impact on livestock production. To show the other side of this reasoning, assume that all livestock in an area use federal forage 10% of the time. Loss of this 10% would mean no feed for more than a month and the livestock would die, so the impact would be 100% rather than the 10%. This reasoning is no more invalid than the previous. It is almost literally true in the water base, yearlong areas due to the intermingled land ownership pattern. There is no alternative to federal forage. In the seasonal areas, the impact is not quite as great. These impacts must be understood and considered before valid management decisions can be made.

The selected plan has the primary objective, the improvement of watershed conditions with the key to attainment being providing for the physiological needs of the vegetation. The heart of the program is the Allotment Management Plan, with the manipulation of livestock grazing being the primary tool. It is indicated that one of the objectives in many cases is a basic change in the plant community. There is no definition as to what ultimate standard the range is to be brought, what the vegetation mix might be, nor the degree of harvest which might be allowed. The options are great and so are the impacts. Using livestock as a tool, the rate of change is slow and great problems can gradually appear -- too late for the permittee to react. Range condition through range management are primary concerns. The livestock operator is primarily concerned with ranch management which must consider range only as one of the elements of making a living for his family. Too great a preoccupation with range can break him. The only real interest the land manager has in ranch management is to utilize the permittees' livestock as a tool for achieving range condition. The result can be a controlled economy for the livestock operator and this impact is not treated. When range is the primary consideration, a great many management options of the permittee are preempted.

It must be understood that livestock operators have objectives and plan toward attainment. In this process they have committed huge amounts of resources, both human and monetary. As of 1969, on the basis of original cost, Sec. 4 and Sec. 15 improvements amounted to \$25,647,942. This does not include incalculable amounts in small actions such as erosion dams, etc., which were not, at the time, worth the paper work. 61% of these funds were spent in 3 states which are largely water base-yearlong.

62-6 The land pattern is intermingled, with most water situated on non federal land. (The homesteads and state selections were set down on the basis of water availability and superior resource value.) The statement does not adequately treat the impact upon management choices of the intermingled state and private owners or the impact upon federal programs of the management choices by non federal landowners. The program assumes correct, infallible management and does not treat the consequences of imposed unwise actions.

Whether it be ranch or range management, either is an art and requires a deep and intimate understanding of a particular environment. No two practitioners make the same choices at the same times and conditions. No set procedure can produce the results gained by a good manager who may or may not use "scientifically accepted" procedures. There is simply no substitute for good judgement.

62-7

The statement fails to deal with the problems of wildlife, in that the non-migratory, and to some degree, migratory management is the exclusive field of the states. The states fully control the numbers and the BIM can only respond to state policy by forage management. This same situation may, as a result of current litigation, apply to wild horses and burros. Little or no consideration has been given to the impact of these conditions.

62-8

The statement deals with the current status and predicts the consequences of future action or inaction, under certain circumstances. It is the consensus of a great many authorities that this nation and the world is facing a serious food and fibre shortage in the near future. Neither the program nor the alternatives consider actions to respond to this situation, except the rejected alternative for maximum livestock production. Even it does not assume the conditions which would prevail. We are seeing the beginnings of a possible drastic change in methods of meat production as a result of world grain demand. We have used grain to produce meat, but economics is hindering this. Livestock can produce food and fibre where and from sources that nothing else can. It is indicated that a much greater proportion of the red meat supply will be produced from forage, than has been true before. This would indicate a very great shift in the type of livestock grazing a given area. The management techniques of both ranch and range vary considerably when cows are substituted for yearlings and vice versa. The statement generally does not deal with the differences nor the possible alternative. There is the viable alternative of change from cattle to sheep to goats as a choice or any mix of them.

The explanation of the plan indicates that about 108 million acres remain to be covered by AMP. Of this, about 68 million acres will require management actions involving detailed grazing systems. About 20 million will require some management adjustments, and the remaining 20 million will require little or no change in management. In this last case, it would seem improper to spend public funds or require private resources to go through the motions of writing an AMP and the cost of future records if management is satisfactory. This would appear to be management for the sake of management. This impact is neither mentioned nor treated.

PART II-A DESCRIPTION OF THE ENVIRONMENT

62-9

This section describes the various biomes of the west in regard with location, climate, soils, plants, animals, and other pertinent aspects. However, many of the statements made and illustrations (maps) shown are misleading, too general, or totally incorrect.

A criticism must be made of the map on page II-3, for the locations of some of the biomes are incorrect. Specifically, much of southern New Mexico is called a temperate grassland on the map, yet this area is commonly known to be a part of the Chihuahuan Desert. The boundary line between arid(desert) and semi-arid(grasslands or other forms) lands is commonly accepted as being the division between areas of ten inches of precipitation annually or less, and areas of over ten inches annually, respectively.

62-10 The exact location of a line of this type cannot be pinpointed on a map because of frequent fluctuations in precipitation. Therefore, boundaries between deserts and grasslands are difficult to place precisely on a map. However, the map shows Deming, New Mexico; Las Cruces, New Mexico; El Paso, Texas; Douglas, Arizona; and other areas to be part of the Southern Temperate Grassland. This area is by definition a part of the Chihuahuan Desert and is not even close to the grassland boundary. The climate (less than 10" annually), vegetation(cacti and creosote), and general environment of this area is clearly that of a desert, not a grassland.

There are other biomes that are misrepresented on the map. The Palouse Prairie area of Washington is in effect a cold desert(Koppen Classification of B.K.), as rainfall figures for Yakima, Washington prove to be only 7.2 inches per year. There is a great deal of Montane Coniferous Forest shown on the map that does not exist. An example is the so-called forest between Albuquerque and Carrizozo, New Mexico which is no more than a Pinon-Juniper area at higher elevations and grassland down lower. There are large amounts of grassland in Idaho and Oregon that are shown to be cold deserts. They are not deserts, with an annual precipitation of 10 to 20 inches. It is stated on the map that Oak Woodland-Bushland and the Juniper Associate are generally included within the desert biome boundary. If this were a very general matter, that might be totally acceptable. However, there is a tremendous difference between desert and Woodland-Bushland, especially as it relates to grazing. Generalities on the map cannot possibly show the various biomes and their differences, at least not as it is drawn here. A simple precipitation map of the west is far more accurate in showing the locations of the biomes than is this map. An accurate or serious study of the ecology of the west cannot be made when it is based on a map that is too general to show differences, the great differences, that do exist among the grazing areas of the west. The Woodland-Bushland biome should be shown separately from the Desert biome, and in an accurate manner, not as it is, in conjunction with the desert, or in an erroneous manner as on the map on page II-30. The map for the deserts and the map for the Woodland-Bushland are identical except for an area in central California. These areas are not identical and must be shown differently. An accurate study of these two environments cannot be made without accurate maps of these two different areas. This only shows the great generalities of this study and points to the many inaccuracies that resulted when time and efforts were not taken to meticulously study each type of grazing land in the west and then correctly depict this on maps.

62-11 A similar discussion could be made on most of the maps in section II, including wind direction maps, thunderstorm maps, fog maps, temperature maps, and precipitation maps. Again, inaccuracies and generalities prevail and this is not acceptable in a study of this bearing. The generalities shown on these maps have led to erroneous conclusions in many parts of this section, simply because they are much too general to apply but in a few specific areas of each biome area. Since grazing is concerned here, these maps must be detailed and contoured to illustrate local differences. These differences are important to and greatly affect grazing and therefore, are most important to this study. It would seem that any considerations made, either based on the maps or on the text based on the maps, would tend to be erroneous or invalid.

OUR RECOMMENDATIONS ARE:

This Draft Statement should be withdrawn and corrected to meet the stated objections and errors mentioned.

1. The program should have very specifically defined objectives.
2. In the absence of Congressional policy to the contrary, the policy of the Taylor Act should be heeded in giving greater consideration action which would expand to a greater extent the red meat supply of the nation with due regard for economic impact on the livestock industry.
3. Consideration should be given to a fee structure having a differential for yearlings in order to remove the financial penalty for a more flexible operation.
- 62-12 4. Explanation of and the impact of the reduction of grazing by 10 million acres, and the apparent elimination of large numbers of grazing permittees should be made.
5. The significance of public lands grazing in its relationship to economic effect on county and state government should be reexamined and corrected to reflect all factors.
6. Full consideration must be given to the effect of BLM management decisions upon the State and private owners of intermingled lands who may have different goals.
- 62-13 7. Wildlife habitat must be discussed in the context of the complete lack of federal control of numbers or actual management.
- 62-14 8. Consideration should be given to regulating other uses of the public lands in given areas.

Key No.

- 62-1 See item 1, page IX-5 and item 7, page IX-10 of the EIS.
- Continuation of the present program will not result in the reduction of animal unit months of forage available on national resource lands. See Table I-8 on page I-16 of the EIS.
- 62-2 Text is rearranged to present objectives in more than one section. See page I-1 and page VI-1 of the EIS.
- 62-3 The text describing Alternative B (no grazing) has been supplemented to indicate change in State and local tax receipts. Since the grazing system described in this statement would have an overall impact of increasing grazing through provision of additional AUM's, the impact on State and local tax receipts would be favorable. Taxes are levied on property (private land, capital improvements and animals) and on income in varying degrees and methods in different states. Only four of the 11 Western States (New Mexico, California, Utah and Washington) levy taxes on the "possessory interest created by grazing on public lands" (Public Land Law Review Commission Report, page VI-50). In these four states the fee structure may enter into the calculation of the tax, however, BLM is not authorized to have different fee structures in different states for the purpose of affecting State and local tax receipts.
- 62-4 See item 7, page IX-10 of the EIS.
- 62-5 See item 5c, page IX-9 of the EIS.
- 62-6 It is the objective of BLM to utilize public input and participation in the development of land use plans on NRL (see pages I-21 through I-23 of the EIS). In areas of intermingled land patterns, cooperative planning is essential for effective land use decisions including a livestock grazing system designed for a specific grazing allotment. It is the intent of BLM where decisions have been made to implement grazing systems as a result of a land use plan, that these grazing systems will be formulated in the public interest whether the Federal lands are isolated or occur in solid ownership blocks.
- 62-7 State responsibilities in wildlife control and management of migratory and non-migratory animals is recognized. The responsibility of BLM is to provide and manage the habitat for all wildlife species on NRL. Major benefits of proper livestock grazing management as presented in the EIS are provision of more food, cover and water for wildlife species. BLM and state wildlife agencies cooperate closely in balancing wildlife numbers with their habitat, providing habitat

Key No.

62-7 for threatened and endangered species, developing depleted habitat
(cont.) and a host of other cooperative efforts.

Wild horses and burros are the exclusive responsibility of Federal agencies as provided by PL 92-195 until modified by the legislative or judicial processes. However, BLM seeks the advice of many concerned organizations, including state wildlife agencies, in the management, control and protection of these animals.

62-8 The EIS is not written to endorse any specific livestock grazing program on NRL. Nor does it reject the alternative of maximizing livestock production. The purpose of the statement is to explain the impacts of the present program and alternatives to that program.

62-9 Part II, the description of the environment (in which the various biomes are presented) has been largely abstracted from the published literature. The precise detail suggested as necessary by respondent would not add materially to the EIS. The maps and illustrations in Part II are adapted from recognized geographers, ecologists and others. The small scale of the maps precludes precise biome boundary locations.

62-10 Respondent is correct in stating that boundaries between grasslands and deserts are difficult to place precisely, especially so on the maps of the scale shown in the EIS. The biomes and boundaries shown in the EIS were abstracted from the published literature. Another widely quoted reference concerning vegetation distribution is A.W. Kuchler, "Potential Natural Vegetation of the Conterminous United States." Biome boundaries in the EIS conform closely to maps prepared from this reference. The Chihuahuan Desert extends well into Mexico and includes some very productive grasslands as well as other vegetative types.

62-11 Section II, Description of the Environment, has been a fairly standard narrative in several Departmental impact statements. Its purpose is to provide a general overview of the environment in which the program is and will be implemented. The precise accuracy and detail requested by respondent would result in unnecessary volume in the text and complexity and difficulty in reading. If the physical environment is discussed in great detail, then one could argue the biological environment should be discussed in similar detail. It would add little value or clarity to provide precise detail of soils, vegetation and animals or biome boundaries and climatic maps. Local differences of wind movement, fog, temperature and precipitation have little effect on grazing; on the other hand, broad differences represented by biomes do influence grazing practices.

Key No.

- 62-12 The Bureau of Land Management planning system process explained under pages I-21 through I-23 of the EIS provides for the input necessary before decisions are made on public lands affecting all interested users. Certainly those lands that are intermingled with private and state ownership will be analyzed for factors that must be taken into consideration in management decisions that apply to those lands.
- 62-13 See response to comment 62-5.
- 62-14 The comment is not relevant to the Environmental Impact Statement of livestock grazing on national resource lands. See item 9, page IX-12 of the EIS.



NEW MEXICO CONSERVATION COORDINATING COUNCIL

POST OFFICE BOX 142

ALBUQUERQUE, NEW MEXICO 87103

July 12, 1974

Director
Bureau of Land Management
Department of Interior
Washington, D. C. 20240

Dear Director:

I have reviewed the Draft Environmental Impact Statement, "Livestock Grazing on National Resource Lands." I find the statement to be an ambitious undertaking which shines in some areas and fails miserably in others.

My first general comment is directed toward the writing itself. The grammar is poor and the style is often convoluted. The result is that the statement is often impenetrable. The lack of clarity seriously impedes understanding -- and understanding is an objective, I would hope, of a programmatic statement.

Another general deficiency is the statement's consideration of archeological, historical and cultural human interest values. All such sections suffer from vagueness, lack of insight, and superficiality.

63-1 If these values are to be included in the EIS -- and I believe they should be -- then they require more meaningful exploration. I would think, for example, an overview of the "Turner thesis" of American history would be included. Historical considerations could provide further justification for the AMP program.

63-2 My last general observation is that BLM's aesthetic system could set back aesthetic theory over 700 years. Perception of beauty is oftentimes dependant upon the expectations of the viewer. Certainly, unused forage is anything but beautiful to some livestock operators, while the slightest hint of grazing constitutes ugliness for the more rabid preservationists. When dealing with aesthetics, it is always necessary to identify, at the very least, particular viewer groups. Such phrases as ". . . could add to aesthetic values" are meaningless unless a particular viewer or viewer group is mentioned. I should also point out that "scenic" and "aesthetic" are not synonyms.

The following are specific observations and criticisms:

63-3 1. p. I-8 ". . . while the requests for AMPs from livestock operators have grown." Growth of requests should be documented and sources of request should be cited.

63-4 2. p. I-12 "An additional estimated \$4,500 of private funds, primarily from range users, would be invested in each AMP." This is the first of several mentions

of private funds being used on public lands.

Such private investment may well result in the grazing leasee feeling as though he has a proprietary interest

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63-4
(cont.) | in the public land. In fact, by virtue of his investment,
| he does have such an interest. The statement should ex-
| plore the difficulties inherent in this situation. What
| happens upon lease termination? Are there judicial de-
| cisions in such cases? What do the present participants
| in the AMP program think of private investment on public
| lands?

63-5 | 3. p. II-2 ff. The range condition classifications here
| and elsewhere seem quite inaccurate. The methods used
| in the 1964 survey should be outlined.

63-6 | 4. p. II-13 "Agricultural activities remove nutrients
| . . . disturbing the natural balance." I would point out
| that it is highly doubtful that such a thing as "natural
| balance" even exists. What agricultural activity does
| disturb is the natural dynamics. The many "cycles"
| depicted are somewhat simplistic as well. I believe
| that the readers of the statement could well handle
| more precise descriptions of the various biomes. That
| is, assuming that same would be well written.

63-7 | 5. p. III-2 "Animal wastes are deposited on the soil
| surface, introducing foreign pathogens into the soil."
| I'm unsure of the sense in which "foreign" is used.
| Which pathogens are we concerned with here? Are they
| in fact foreign -- or are they simply foreign because
| there is a cow present?

| 6. p. III- 29 "Predator control practices have no
| influence on vegetation." See below, #7.

63-8 | 7. p. III-38 I agree that prey-predator relationships
| are not readily quantifiable. Nonetheless, there is
| evidence to suggest that depredation is an integral
| part of rodent population dynamics. In this sense, the
| above quotation is somewhat misleading. What is most
| important, though, in this section is that population
| controls can either be a management technique or control
| for the sake of control. The accent in this section
| seems to be on the later. I would much prefer the accent
| to be on wildlife and range management which includes
| occasional control measures.

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63-9 8. pp. III-38,39 "In aiding the reestablishment of important wildlife species" and "control in such instances would benefit wildlife." These phrases should include the word "other," as in "other important wildlife" and "would benefit other wildlife." Is it really necessary to point out that both predators and rodents are wildlife too? This reflects the "control" syndrome delineated above.

63-10 9. p. III-39 ". . . access roads for hunters will allow better harvests of big game resulting in a more balanced ecosystem." "Balanced" should be replaced by "natural" or "desirable." In truth, better access will allow increased harvests. Whether or not they are "better" harvests depends upon BLM and state wildlife agencies. Population monitoring will become more important. Enforcement will be complicated -- increased access usually means increased poaching.

63-11 10. p. III-39 "Rodent Control" -- or rodent management can be accomplished by means other than and, in some cases, in addition to poisoning. Alternatives should be discussed.

63-12 11. III-40 "' . . . additional access will . . . permit better harvests of excessive numbers." This is a better statement than the quotation in #9 above. "Can," however, would be more appropriate than "will."

63-13 12. III-46 "Construction and use of roads and trails frightens wild horses and burros. However, these roads and trails provide better access for observation of the animals by the general public, unless human activity forces the animals to more remote areas." I think the odds are that in most cases the horses and burros would move to more remote areas. The sentence is a dodge and the problem should be discussed at greater length.

63-14 Generally, wild horses and burros seem to present a real problem to the implementation of AMPs. AMPs may result in confinement of these ranging animals.

63-15 Might there not be a management problem on a particular allotment? A difficult question must be asked -- if depredation can't limit populations to habitat carrying

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63-15 (cont.) capacity, what can BLM do to reduce populations in order to protect range conditions? Are population reduction measures possible under the present law? My understanding is that they are not. This area should be examined carefully within the impact statement.

63-16 13. III-52 I don't believe that livestock grazing is necessarily incompatible with many recreational uses. The impact of grazing upon recreation should be considered on each individual form of recreation. Rock hounds, for example, should experience little difficulty. Primitive campers might experience much. The impact of recreation upon grazing might well be considered also. Hunting on an allotment could disturb the livestock -- and the livestock operator.

Many eastern visitors enjoy seeing real, live livestock while camping. It is part of their concept of the "west."

63-17 14. III-58 "Line cabins and sheep camps occur on national resource lands and are a pleasant reminder of the "Old West" to many users." Statement is true, but misplaced. It belongs under either aesthetics or human interest values --- not under ecological interrelationships.

63-18 15. III-58 Fences do not per se cause deaths among ORV users of public lands. Carelessness on the part of the user does. User carelessness will not increase or decrease under AMPs. Additional fences will cause additional deaths.

16. III-59 "Aesthetics" General deficiencies are pointed out earlier. As a case in point, "man-made structures" can enhance the aesthetics of an area to some viewers. Line cabins (#14 above) are an example. Another is found in the fact that some users find windmills incredibly pleasing.

17. IV-4 "Corrals" Corrals hold fascination for some. They conjure up that "Old West" myth.

63-19 18. IV-4,5 "Water Development" This section should specify bird ladders for metal stock tanks as well as

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63-19

(cont.) mention guzzlers.

63-20 19. "Roads and Trails" I would hope that "minimum standards" does not imply minimum environmental standards to some readers. (p. IV-5)

63-21 20. p. IV-7 "Vegetation Manipulation" "In scenic areas . . ." Who determines what is or is not scenic? This problem is very real. A sagebrush flat is scenic to some and ugly to others. BLM is going to be forced to deal more concretely with this highly abstract concept. This impact statement is a good place to start.

63-22 21. p. IV-8 "Animal-Insect control" Again, I would rather see BLM talking in terms of management instead of control. Proposal number 6 does express this philosophy and that is good. The section title, however, conflicts with a management philosophy.

63-23 22. p. V-3 "Life cycles, nesting, breeding and other natural wildlife phenomena may be interrupted or altered during road construction and subsequent use." While this is indeed an "adverse impact which cannot be avoided," it certainly can be mitigated. This should be pointed out and discussed.

63-24 23. p. V-3 "Harrassment by vehicle traffic" is also to some degree mitigable. Enforcement efforts will be required. This should be discussed.

24. "Alternatives" Obviously the only seriously viable alternative is "D" -- the acceleration of the program. The cost factor seems to militate against this alternative, however. Disregarding any political and economic realities, it would appear that the additional money would be well spent. I lack the expertise to competently deal with politics or economics. If the political and economic climate permit, alternative "D" ought to be placed in effect. It would not be remiss, by the way, if the statement were to deal with these problems while exploring alternative "D."

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In closing, I'd like to offer some praise. Breaking the statement into biomes was an insight. That organizational scheme is of immense help in dealing with the statement. I also believe that the photographs are helpful -- more than just entertainment.

Thankyou for the opportunity to review this statement.

Sincerely,

William H. Bishop, President

Organizations agreed:

Sierra Club, Albuquerque Group

N. M. Herpetological Society

Society of American Foresters

N. M. Ass'n of Natural Resource Conservation Districts

Society of Range Management

Central New Mexico Audubon

Izaak Walton League

Trout Unlimited

Organizations opposed:

None

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Key No.

63-1 No change proposed.

The EIS beginning on page I-17 deals with the history and background of use on western lands of the U.S. It does reflect the "Turner Thesis" which dealt with the "exploitative" use of western lands by many different interests.

63-2 No change proposed.

This is a broad programmatic statement dealing with a large section of the western United States. It would be almost impossible to relate aesthetic values to various viewer groups and very confusing to the reader. It may be possible in the future, where analyses deal with local situations, that a more intense evaluation could be made relating to particular viewer groups.

63-3 Text expanded to respond to comment. See EIS, Table I-3, footnote d/.

63-4 Refer to item 4, page IX-7 of the EIS.

63-5 See response to comments 45-13 and 45-26.

63-6 The statement referring to "natural balance" is revised. See page II-8 of the EIS. References to "simplistic cycles" and "more precise descriptions of the various biomes" assume that all reviewers of the document have a similar interest and high level of knowledge and experience. It is quite important that the "general public" have an understanding of the program as well and the statement is written in terminology hopefully understandable to the majority of interested people.

63-7 Pathogens from animal wastes are foreign to the soil biota.

Text revised. See page III-1 of the EIS.

63-8 Text revised. See page III-21 of the EIS.

63-9 Text revised. See page III-28 of the EIS.

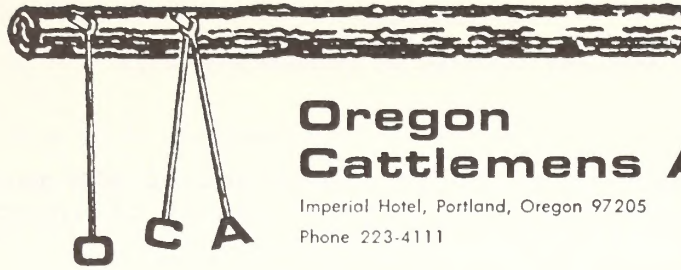
63-10 The statement as written concerning the beneficial or detrimental effects of additional roads and trails is qualified. Roads and trails have been constructed to provide for improved hunter access. Integrated management plans can conceivably aid in providing "better harvest" and a more "balanced" ecosystem. This explanation was further qualified with the phrase "in some cases--." See page III-29 of the EIS.

Key No.

- 63-11 No attempt was made to explain all methods applicable to control of rodents. The emphasis was placed on impact to normal food chains, target species and on other wildlife where secondary poisoning occurs.
- 63-12 Text revised. See pages III-28 and 29 of the EIS.
- 63-13 Text revised. See page III-32 of the EIS.
- 63-14 Any allotment management plan that is developed and implemented in areas inhabited by wild horses and burros will have to consider in the objectives of the AMP those considerations that will provide for the welfare of the wild horses and burros. Certainly the management problems in areas of joint livestock, wildlife and wild horse and burro use are very significant. Nonetheless, they will have to be addressed and solved to the best of the ability of the land manager.
- 63-15 The Wild Horse and Burro Act (Public Law 92-195) authorizes the Secretary of the Interior to reduce populations of horses and burros where excess populations exist. Under existing law the provisions for reducing populations include: (1) relocation, (2) transfer to individuals or organizations under a private maintenance agreement and (3) disposal by humane methods.
- 63-16 No change proposed.
- This is a broad programmatic statement dealing with millions of acres--it is not realistic to develop the detail suggested.
- 63-17 No change proposed.
- This is an opinion dealing with the location of the statement in the report.
- 63-18 Text revised. See page III-41 of the EIS.
- 63-19 Text revised. See page IV-3 of the EIS.
- 63-20 The passage about road standards has been rewritten to clarify the meaning of "minimum standards." See page IV-4 of the EIS.
- 63-21 No change proposed.
- It is agreed that "scenery" is a difficult term to deal with; however, it was felt that concern should be expressed in this statement about practices that change the landscape. The Bureau is developing criteria dealing with scenic classification.

Key No.

- 63-22 Animal and insect control are appropriate phases of mitigation as related to livestock grazing management program. No conflict of management philosophy is evident. All measures if accepted are restrictive. All are related to a responsive resource ethic.
- 63-23 Mitigative measures are not appropriate for inclusion in this section where adverse impacts of the program are described.
- 63-24 Text revised. See page V-2 of the EIS.



Oregon Cattlemens Association

Imperial Hotel, Portland, Oregon 97205

Phone 223-4111

June 13, 1974

Honorable Rogers C.B. Morton
Secretary of the Interior
Washington, D.C.

SUBJECT: Draft Environmental Impact Statement on Livestock
Grazing on National Resource Lands.

Dear Secretary Morton:

64-1

In regards to the Impact Statement in conjunction with the BLM Organic Act (HR 5441), pending in Congress, it becomes apparent that the agency desires to greatly reduce livestock grazing in all western states. This is evidenced by the stated intent in the impact statement of withdrawing 10 million acres from livestock use.

It is general feeling of our Public Lands Committee, endorsed by the Oregon Cattlemen's Association, that the Environmental Impact Statement, which was made available to the public on April 11, 1974, should be withdrawn and corrected.

PRESIDENT •

E. E. Davis

Haines, Oregon 97833

1st VICE PRESIDENT •

Bert Hawkins

Ontario, Oregon 97914

2nd VICE PRESIDENT •

E

64-2

Jordan Valley, Oregon 97910

Les Robinson

Union, Oregon 97883

R. J. Philippi

Arlington, Oregon 97812

George Landrith

Salem, Oregon 97301

Louis Randall

Bonanza, Oregon 97623

Tom

Athens, Oregon

64-3

TREASURER •

Dave Densley

Richland, Oregon 97870

EXECUTIVE VICE PRESIDENT •

Donald Os

Imperial
Portland, Oregon

64-4

We take extreme exception to this document for the following reasons:

1. The livestock grazing program has no specific objectives. We have no congressional policy contrary to the Taylor Act objectives; therefore this grazing program, if implemented, would destroy the economy of the nation's western livestock industry and the future red meat supply of our nation's consumers. Additional reductions in livestock grazing will be made where grazing conflicts with recreational uses.

2. The significance of public lands grazing in its relationship to the economic effect on county and state government; should be reexamined and corrected to reflect all factors; including a fee structure having a differential for yearlings to remove the financial penalty of a more flexible operation.

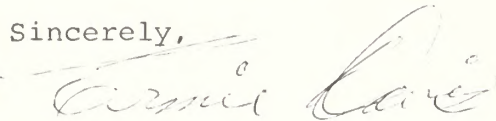
3. Explanation of, and the impact of, the reduction of grazing by 10 million acres, and the apparent elimination of large numbers of grazing permittees should be made. Full

Oregon Cattlemens Ass'n.

Page 2.

consideration must be given to the effect of BLM management decisions upon the State and private owners of intermingled lands, who may have different goals.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ernie Davis", written over a horizontal line.

ERMIE DAVIS, President
Oregon Cattlemens Assn.

REGON CATTLEMENS ASSOCIATION

Comments On
Draft Environmental Impact Statement
Livestock Grazing on National Resource Lands

64-5

This draft statement was made available to the public on April 11, 1974. It describes, in very general terms, the livestock grazing program and policy, alternatives considered, and some environmental impacts of each. Basic legal authority for management action on National Resource Lands, for most uses, is contained in four primary acts; subject to environmental considerations mandated by the National Environmental Protection Act. The major act is the Taylor Grazing Act, which sets Congressional policy. The policy indicated is that the Secretary of Interior (BLM) determine which of the lands are chiefly valuable for grazing and growing forage crops and administer them in such a way as to protect them from injury, provide for orderly use, improve and develop the range, and stabilize the dependent livestock industry. Range improvement, in this context, clearly meant for livestock use. There is no authority for most wildlife management in that the wildlife are the property of the states, generally. Most commercial uses may be managed, while non-commercial may not, except in the context of preventing injury to the lands or resources. In the absence of direct Congressional policy, BLM has developed policies which are found, primarily, in the Bureau Manual; and secondarily in regulations which the manual supposedly interprets.

The statement describes the Bureau program for grazing management which has been in the process of implementation for several years. It consists of examining the resources, determining suitability for grazing, and developing a plan for manipulation of grazing use which it is hoped will ultimately produce a desired range condition. Range condition does not necessarily mean either livestock range or wildlife range or a combination. It is stated that the key is the physiological needs of the vegetation. The current environment is very loosely described. The description contains glaring inaccuracies. Various impacts of the selected program are described, but with significant omissions. Four alternative programs and their impacts are described. Neither a purely custodial program nor the elimination of grazing is a viable alternative, even if it were legal. Both remaining alternatives, maximizing grazing and accelerating the present program contain the same flaws as the selected program in that they are both totally dependent upon the success of the Allotment Management Plan system which sets goals and uses the livestock operation as a tool for accomplishment. Unless the goal and the means for attaining it are acceptable to the

individual permittee, the AMP will be unsuccessful. The selected plan predicts that some 140 million acres will be grazed out of 171 million subject to consideration for grazing. This is 10 million less than are presently grazed. About 7 million acres are in tracts too small to manage, which leaves some 133 million either now under or subject to an AMP. There are presently about 22,000 operators who hold 24,000 licenses, permits, or leases. About 15,700 of these permits are within grazing districts and it must be assumed that this will be the location of most AMP's. It is stated that there is need for about 8230 AMP's and that all 133 million acres will be covered. There is no explanation of the difference between 15,700 permits and 8230 AMP's, except that 10 million acres will be removed from grazing. It would appear that there will be a significant reduction in the number of ranch operations, forced partnerships, or elimination of permittees. There is no satisfactory explanation or discussion of impact.

64-6

Many of the conclusions in the statement are based upon incomplete, misunderstood, or misinterpreted information. AUM's of forage are calculated from the number of head reported by the permittees (animals over 6 months of age) times the number of months on the range. Since the majority of permittees are breeder operators, and calves are weaned and sold by six months of age, they never appear in the calculation. They go to feed lots and are a very significant factor in the nation's meat supply. The statistics do not consider a very important part of federal grazing. Livestock must have a "home" for the entire year. In many cases even a 30-day grazing season is the key to a yearlong operation. The forage quality may have little food value and the animal may lose significant weight for a time, but the grass used as a filler with protein supplement will keep her alive. Statistics would indicate that AUM's of federal forage bear a certain relationship to total forage requirements in an area, therefore that relationship is the total impact on livestock production. To show the other side of this reasoning, assume that all livestock in an area use federal forage 10% of the time. Loss of this 10% would mean no feed for more than a month and the livestock would die, so the impact would be 100% rather than the 10%. This reasoning is no more invalid than the previous. It is almost literally true in the water base, yearlong areas due to the intermingled land ownership pattern. There is no alternative to federal forage. In the seasonal areas, the impact is not quite as great. These impacts must be understood and considered before valid management decisions can be made.

The selected plan has the primary objective the improvement of watershed conditions with the key to attainment being providing for the physiological needs of the vegetation. The heart of the program in the Allotment Management Plan, with the manipulation of livestock grazing being the primary tool. It is indicated that one of the objectives in many cases is a basic change in the plant community. There is no definition as to what ultimate standard the range is to be brought, what the vegetation mix might be, nor the degree of harvest which might be allowed. The options are great and so are the impacts. Using livestock as a tool, the rate of change is slow and great problems can gradually appear -- too late for the permittee to react. Range condition through range management are primary concerns. The livestock operator is primarily concerned with ranch management which must consider range only as one of the elements of making a living for his family. Too great a preoccupation with range can break him. The only real interest the land manager has in ranch management is to utilize the permittees' livestock as a tool for achieving range condition. The result can be a controlled economy for the livestock operator and this impact is not treated. When range is the primary consideration, a great many management options of the permittee are preempted.

It must be understood that livestock operators have objectives and plan toward attainment. In this process they have committed huge amounts of resources, both human and monetary. As of 1969, on the basis of original cost, Sec. 4 and Sec. 15 improvements amounted to \$25,647,942. This does not include incalculable amounts in small actions such as erosion dams, etc., which were not, at the time, worth the paper work. 61% of these funds were spent in 3 states which are largely water base-yearlong. The land pattern is intermingled, with most water situated on non federal land. (The homesteads and state selections were set down on the basis of water availability and superior resource value.) The statement does not adequately treat the impact upon management choices of the intermingled state and private owners or the impact upon federal programs of the management choices by non federal landowners. The program assumes correct, infallible management and does not treat the consequences of imposed unwise actions.

Whether it be ranch or range management, either is an art and requires a deep and intimate understanding of a particular environment. No two practitioners make the same choices at the same times and conditions. No set procedure can produce the results gained by a good manager who may or may not use "scientifically accepted" procedures. There is simply no

substitute for good management.

The statement fails to deal with the problems of wildlife, in that the non-migratory, and to some degree, migratory management is the exclusive field of the states. The states fully control the numbers and the BLM can only respond to state policy by forage management. This same situation may, as a result of current litigation, apply to wild horses and burros. Little or no consideration has been given to the impact of these conditions.

The statement deals with the current status and predicts the consequences of future action or inaction, under certain circumstances. It is the consensus of a great many authorities that this nation and the world is facing a serious food and fibre shortage in the near future. Neither the program nor the alternatives consider actions to respond to this situation, except the rejected alternative for maximum livestock production. Even it does not assume the conditions which would prevail. We are seeing the beginnings of a possible drastic change in methods of meat production as a result of world grain demand. We have used grain to produce meat, but economics is hindering this. Livestock can produce food and fibre where and from sources that nothing else can. It is indicated that a much greater proportion of the red meat supply will be produced from forage, than has been true before. This would indicate a very great shift in the type of livestock grazing a given area. The management techniques of both ranch and range vary considerably when cows are substituted for yearlings and vice versa. The statement generally does not deal with the differences nor the possible alternative. There is the viable alternative of change from cattle to sheep to goats as a choice or any mix of them.

The explanation of the plan indicates that about 108 million acres remain to be covered by AMP. Of this, about 68 million acres will require management actions involving detailed grazing systems. About 20 million will require some management adjustments, and the remaining 20 million will require little or no change in management. In this last case, it would seem improper to spend public funds or require private resources to go through the motions of writing an AMP and the cost of future records if management is satisfactory. This would appear to be management for the sake of management. This impact is neither mentioned nor treated.

PART II-A DESCRIPTION OF THE ENVIRONMENT

, This section describes the various biomes of the west in regard with location, climate, soils, plants, animals, and other pertinent aspects. However, many of the statements made and illustrations (maps) shown are misleading, too general, or totally incorrect.

There are biomes that are misrepresented on the map. The Palouse Prairie area of Washington is in effect a cold desert (Koppen Clasification of BWK), as rainfall figures for Yakima, Washington prove to be only 7.2 inches per year. There is a great deal of Montana Coniferous Forest shown on the map that does not exist. An example is the so-called forest between Albuquerque and Carrizozo, New Mexico which is no more than a Pinon-Juniper area at higher elevations and grassland down lower. There are large amounts of grassland in Oregon and Idaho that are shown to be cold deserts. They are not deserts, with an annual precipitation of 10 to 20 inches. It is stated on the map that Oak Woodland-Bushland and the Juniper Associate are generally included within the desert biome boundary. If this were a very general matter, that might be totally acceptable. However, there is a tremendous difference between desert and Woodland-Bushland, especially as

64-7 it relates to grazing. Generalities on the map cannot possibly show the various biomes and their differences, at least not as it is drawn here. A simple precipitation map of the west is far more accurate in showing the locations of the biomes than is this map. An accurate or serious study of the ecology of the west cannot be made when it is based on a map that is too general to show differences, the great differences, that do exist among the grazing areas of the west. The Woodland-Bushland biome should be shown separately from the Desert biome, and in an accurate manner, not as it is, in conjunction with the desert, or in an erroneous manner as on the map on page II-80. The map for the deserts and the map for the Woodland-Bushland are identical except for an area in central California. These areas are not identical and must be shown differently. An accurate study on these two environments cannot be made without accurate maps of these two different areas. This only shows the great generalities of this study and points to the many inaccuracies that resulted when time and efforts were not taken to meticulously study each type of grazing land in the west and then correctly depict this on maps. A similar discussion could be made on most of the maps in section II, including wind direction maps, thunderstorm maps, fog maps, temperature maps, and precipitation maps. Again, inaccuracies and generalities prevail and this is not acceptable in a study of this bearing.

64-7
(cont.)

The generalities shown on these maps have led to erroneous conclusions in many parts of this section, simply because they are much too general to apply but in a few specific areas of each biome area. Since grazing is concerned here, these maps must be detailed and contoured to illustrate local differences. These differences are important to and greatly affect grazing and therefore, are most important to this study. It would seem that any considerations made, either based on the maps or on the text based on the maps, would tend to be erroneous or invalid.

RECOMMENDATIONS OF THE OREGON CATTLEMEN'S ASSOCIATION
ARE AS FOLLOWS:

This Draft Statement should be withdrawn and corrected to meet the stated objections and errors mentioned.

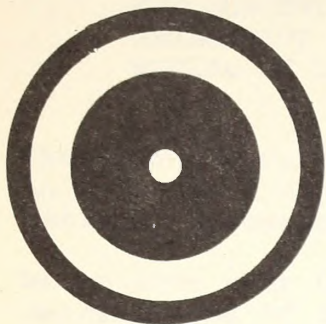
1. The program should have very specifically defined objectives.
2. In the absence of Congressional policy to the contrary, the policy of the Taylor Act should be heeded in giving greater consideration action which would expand to a greater extent the red meat supply of the nation with due regard for economic impact on the livestock industry.
3. Consideration should be given to a fee structure having a differential for yearlings in order to remove the financial penalty for a more flexible operation.
4. Explanation of and the impact of the reduction of grazing by 10 million acres, and the apparent elimination of large numbers of grazing permittees should be made.
5. The significance of public lands grazing in its relationship to economic effect on county and state government should be reexamined and corrected to reflect all factors.
6. Full consideration must be given to the effect of BLM management decisions upon the State and private owners of intermingled lands who may have different goals.
- 64-8 7. Wildlife habitat must be discussed in the context of the complete lack of federal control of numbers or actual management.
- 64-9 8. Consideration should be given to regulating other uses of the public lands in given areas.

Oregon Cattlemens Association

Key No. 64

Key No.

- 64-1 See item 1, page IX-5 and item 7, page IX-10 of the EIS.
- 64-2 See response to comment 62-2.
- 64-3 See response to comment 62-3.
- 64-4 See response to comment 62-4.
- 64-5 The Bureau recognizes that wildlife management responsibilities are vested in the states. The Bureau has the responsibility for wildlife habitat management on NRL. The Bureau and state fish and game agencies cooperate closely in managing numbers and habitat of wildlife. One primary benefit of the intensive livestock grazing management program described in the EIS is that wildlife habitat can be protected and improved by livestock management actions and certain supportive measures.
- 64-6 See item 5c, page IX-9 of the EIS.
- 64-7 See response to comment 62-5.
- 64-8 See response to comment 62-6.
- 64-9 See response to comment 62-7.



OREGON ENVIRONMENTAL COUNCIL

2637 S.W. WATER AVENUE, PORTLAND, OREGON 97201 / PHONE: 503/222-1963

July 3, 1974

Director
Bureau of Land Management
Washington, D. C. 20240

Dear Sir:

Enclosed please find two copies of our
Critique of the Draft Environmental Impact
Statement for Livestock Grazing Management
on National Resource Lands.

Sincerely,

Larry Williams
Larry Williams
Executive Director

LW:jan
Enclosure

AMERICAN INSTITUTE OF ARCHITECTS
The Portland Chapter
Southwestern Oregon Chapter
AMERICAN INSTITUTE OF PLANNERS
Oregon Section
AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS
Oregon Section, PNW Chapter
ANGLERS CLUB OF PORTLAND
AUDUBON SOCIETY, Portland
BAY AREA ENVIRONMENTAL COMMITTEE
Coos Bay, Oregon
CHEMEKETANS, Salem, Oregon
CITIZENS FOR A CLEAN ENVIRONMENT
Corvallis, Oregon
CLATSOP ENVIRONMENTAL COUNCIL
COLUMBIA RIVER FISHERMAN'S
PROTECTIVE UNION
COMMITTEE FOR MINAM ACTION, INC.
Portland, Oregon
ECO-ALLIANCE, Corvallis
EUGENE FUTURE POWER COMMITTEE
EUGENE NATURAL HISTORY SOCIETY
FACULTY WIVES OF CENTRAL COMMUNITY
COLLEGE, Bend
4-H CLUB CARROT-TOPPERS, Scappoose, Oregon
FRIENDS OF THE EARTH
GARDEN CLUBS of Cedar Mill, Corvallis,
Eastmoreland, Gervois, Nehalem Bay,
McKenzie River, Scappoose, Portland, Villo
GREENLEAF CLUB OF FIRST UNITARIAN CHURCH
Portland
JUNIOR LEAGUE, Eugene, Portland
LANE COUNTY PLANNED
PARENTHOOD, Eugene
McKENZIE FLYFISHERS, Eugene, Oregon
McKENZIE GUARDIANS, Blue River, Oregon
MT. HOOD COMMUNITY COLLEGE
OUTDOOR CLUB
NORTHWEST STEELHEADERS COUNCIL OF TROUT
UNLIMITED, Milwaukie, Tigard, Willamette Falls
NORTHWEST ENVIRONMENTAL
DEFENSE CENTER
OBSIDIANS, INC., Eugene, Oregon
OREGON CITIZENS FOR CLEAN AIR
OREGON GUIDES AND PACKERS, Vido, Oregon
OREGON LUNG ASSOCIATION
OREGON PARK & RECREATION SOCIETY
Corvallis, Oregon
OREGON SCIENCE TEACHERS ASSOCIATION
OREGON SHORES CONSERVATION COALITION
O.S.P.I.R.G.
O.S.U. FIN AND ANTLER CLUB
Corvallis, Oregon
PLANNED PARENTHOOD ASSOCIATION, INC.
Portland
P.U.R.E., Bend, Oregon
REED COLLEGE OUTING CLUB
Portland, Oregon
ROGUE ECOLOGY COUNCIL
Ashland, Oregon
SALEM BEAUTIFICATION COUNCIL
SANTIAM ALPINE CLUB
Salem, Oregon
SELLWOOD MORELAND IMPROVEMENT
LEAGUE, Portland
SIERRA CLUB
Pacific Northwest Chapter
Mary's Peak, Corvallis
Rogue Valley, Ashland
Columbia Group, Portland
Mt. Jefferson, Salem
SOCIETY FOR OREGON AVIAN RESEARCH
SPENCER BUTTE IMPROVEMENT ASSOCIATION
Eugene, Oregon
STEAMBOATERS
SURVIVAL CENTER, U. of O., EUGENE
TRAILS CLUB OF OREGON
TRI COUNTY NEW POLITICS, Lake Oswego
WESTERN RIVER GUIDES ASSOCIATION, INC.
WILLAMETTE RIVER GREENWAY ASSOCIATION
WOMEN'S ARCHITECTURAL LEAGUE OF PORTLAND
WOMEN'S INTERNATIONAL LEAGUE FOR
PEACE AND FREEDOM, Portland
ZERO POPULATION GROWTH
Lane County

CRITIQUE BY THE OREGON ENVIRONMENTAL COUNCIL OF THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR LIVESTOCK GRAZING
MANAGEMENT ON NATIONAL RESOURCE LANDS, SUBMITTED TO THE
BUREAU OF LAND MANAGEMENT, JULY 1, 1974.

The Oregon Environmental Council appreciates the opportunity to submit this critique on your Draft EIS for livestock grazing management on National Resource Lands.

We believe that the management of public land requires comprehensive descriptions of local area problems, complete public involvement and participation in planning, and the complete sharing of basic information by the managing federal agency, if the agency is to fulfill its obligations to the owners of the land. Accountability in short, for the decisions it makes and the actions it takes. Impact Statements do not fulfill the requirements of Public Law 91-190 of the 91st Congress unless they describe where damage has or is occurring to the land, the specific causes of degradation of the natural resources, and the positive actions proposed or are being taken to safeguard the environment from a repetition of the causes of degradation.

65-1 The Draft EIS of March 1974 is a generalize recitation of conditions that does not relate to any local conditions in Oregon. It completely fails to describe by identifiable geographic areas where impact problems exist and offers nothing to the public as to proposed actions designed to safeguard natural resources from existing damaging impacts on specific pieces of land. There are many local conditions that can only be adequately described by the preparation of EIS's for named and designated watersheds, grazing allotments or natural geographic units of similar topography and vegetation.

65-2 Even the sample Allotment Management Plan for the Boise Front contained in the appendix of the Draft EIS omits quantitative data as to the conditions of the vegetation on the area. Only generalized goals are described such as, "Achieve proper vegetative management, which in turn will provide more feed for wildlife and domestic stock." What kind of vegetation is considered proper for the area? Big sagebrush, cheat-grass, rabbit brush? Is there competition between livestock and big game for the range needed by game for winter use? If there is competition for the forage on the winter range, is there any specific plan to eliminate the competition? The sample MFP is silent on any specific action that is to be taken. It disposes of the problem by omitting to describe what actually will be done to stop the "critical use pressure" on the winter deer range. Probably, the real solution to this problem is removal of the livestock, but the plan does not describe any specific solutions except a general reliance upon use of the rest rotation system to effect the changes in use considered to be necessary.

65-3 The proposed grazing plan for the Boise Front Allotment authorizes grazing to begin about June 1 but the Interim Management program allows grazing to begin as early as March 15, which must be considered to be the period of the year when vegetation is most susceptible to grazing damage. The

65-3
(cont.)

statement on page II-43 of the Draft EIS is applicable to the early grazing the interim management will allow. "The grasslands are most vulnerable to damage early in the growing season and in periods of drought, which commonly occur." The facts seem to reveal that the March 15 season is too early to start grazing, so is there any compelling reason to continue a practice that is recognized to be damaging to the vegetation and the land? There is no target date described when the proposed management plan will become effective so it can only be presumed that too early grazing of the vegetation will continue for five, ten or even twenty more years.

65-4

While the Boise Front Plan describes the wildlife habitat to be in only fair to poor condition, it apparently is not in critical enough condition to justify removal of any of the permitted livestock or change the season of use to improve the habitat for wildlife. The plan does clearly demonstrate the dominant place given to the grazing of livestock over other uses and the expenditures for range improvements that are necessary to carry out plans to insure that that objective is achieved. During the interim period of management the permittees are licensed for 604 AUMs. In addition, an undisclosed number of sheep will be grazed in the allotment. Planned range improvements are estimated to cost \$16,000,000, or an investment of about \$25.00 per AUM. Wildlife may be beneficiaries for a small part of this investment but its purpose primarily appears to be to enhance the usability of the land for the grazing of livestock. The key question is whether its long time management and its greatest public value is for wildlife or for the maintenance of a very small amount of grazing for livestock? The Boise Front Plan omits analysis of alternatives for other than continued use by livestock.

65-5

A careful study of the Draft EIS discloses that it offers nothing of value to a reviewer as to the why, how, when and where of specific actions designed to correct unsatisfactory conditions on designated areas of land are to be programmed. These comments on the Boise Front AMP are submitted to show that it also omits pertinent basic data concerning quantitative measurements and ratings of land conditions, except to describe in broad general language such as, "the area is one of the most critical mule deer winter ranges for the largest and most productive mule deer herd in the State." The AMP leaves many questions of major importance unanswered and establishes no time schedules for accomplishment of specific tasks.

65-6

The March 1974 Draft EIS can only be described as a public relations document, which for the casual reader cleverly masks the problems and the true conditions that exist on specific pieces of national resource lands. It is a bulky document because it is repetitive in content. Impacts on the land wherever they occur differ only in their degree of severity. The laws of nature are universal in effecting the life and

65-6 (cont.) health of vegetative organisms. The reaction of living organisms to impacts caused by overgrazing is similar whether they occur in eastern Oregon or on the plains of Texas. In both cases nature has imposed limits upon the amount of use that can be made of an organism or individual plant without killing it.

While the Draft EIS devotes much space to saying the same things for each Biome, its statements following the title GRAZING AND VEGETATION RELATIONSHIP on pages II-7, II-8 and II-9 is a creditable description of the impact grazing has upon vegetation. It is factual and true. However, the Draft EIS strays from facts in these statements on page I-4:

65-7 "Overgrazed ranges will improve more rapidly with proper livestock grazing than with no livestock grazing. Livestock can be used to trample seed into the soil thereby promoting better soil cover and more forage; to remove stifling old growth on plants by grazing, thus increasing plant vigor and production of usable forage; and to reduce fire hazard."

65-8 That paragraph is full of assertions for which valid proof is lacking. There are some half-truths in it, but half-truths should not be included in a document prepared for distribution to the public by a federal agency unless the assertions made are fully explained, if the agency values its credibility. It is asserted that the animal that caused the depletion of the land is the animal that can restore or repair the land more rapidly than if the land is left to recover without the aid of the cow. There is no valid evidence as Ellison found, "proving the beneficial effect of grazing." The claim that "Overgrazed ranges will improve more rapidly with proper livestock grazing than with no livestock grazing," lacks the validity of scientific testing. The statement evidently depends for its asserted validity upon Hormay's "Principles of Rest Rotation Grazing and Multiple Use Management." A system of management that depends for its success upon adjusting or reducing the rate of stocking to an amount that will balance with the existing forage productivity, and allowing a margin of safety for the fluctuations in productivity caused by drought and other unpredictable impacts. The successful application of the rest rotation system of management requires special conditions, and for that reason alone cannot be claimed as a universal cure for the ills of overgrazing. The whole truth should be told about rest rotation grazing before extensive environmental degradation continues to grow because of its claims to be the salvation for all rangelands.

65-9 More unproven assertions are the statements made about the value of livestock grazing for reducing the fire hazard.

[Page I-4, "Livestock can be used...to reduce fire hazard."
Page III-35, "Unused grasses and forbs would increase the fire hazard."

Page III-52, "Removal of livestock... wildfire will become more prevalent and hazardous to structures, people, and wildlife. Removal may be necessary from areas identified in the planning system. However, the buildup of fuel as a result of removal could cause more frequent and damaging wildfires."

Page III-56, "Fire has historically been a natural force in the ecosystem in maintaining an ecological balance."

(This Statement conflicts with the other assertions)

Page IV-3, "The impact of increased fire hazard resulting from ungrazed forage can be mitigated by: (b) contract or hiring of grazing when needed to remove potentially flammable vegetation."

Page V-4, "With increased vegetative production resulting from management actions, wildfires will become more prevalent."

Page VIII-12, "Wildfires will become more prevalent as a result of accumulation of fuel."

There is no valid proof or evidence to support the claims that grazing has had any significant value in decreasing the frequency of wildfires or in the reduction of fire hazards. To be effective at all the degree of grazing would have to be so destructive as to create a condition of almost bare ground resulting in extreme harmful impacts upon the environment.

A competent professional in fire control and fire management has this to say about grazing and its value as related to wildfire:

"For years many livestockmen have advocated that they can reduce the fire hazard in forested areas by heavy grazing. Some land managers seem to have trouble in analyzing such a proposal. A review of the basics is all that is needed to show the statement to be faulty. It is assumed that livestockmen are referring to the mixed conifer, ponderosa pine, chaparral and foothill areas, where fire is more common.

"When viewed positively, it requires both proper grazing and proper fire management to obtain a wildland environment that is economically beneficial to mankind and his fellow organisms.

"To view it negatively, it has taken both overgrazing and over fire protection to obtain most of the retrogression of the wildland resources that we have today. Proper utilization on good ranges will not materially reduce the fire hazard. Besides, fire at the right time and place is important to succession in the forest types. The degree of grazing that could reduce the fire hazard will reduce forage production for livestock, expose the soil to erosion, and in some instances allow annuals such as cheatgrass, which is an extreme fire hazard, to invade into overgrazed areas."

A policy matter that is inimical to the public's use of its land, and is not generally known, is that federal agencies encourage livestock operators to invest their private funds in placing improvements of permanence on publicly owned land.

Page I-12, "Generally, a minimum of \$30,000 in federal funds will be required for developing and implementing an AMP. An additional estimated \$4,500 of private funds, primarily from range users, would be invested in each AMP.

Page III-51, "In summary, the livestock grazing management program will require increased efforts in management of livestock and land resources, and perhaps greater investments in supportive facilities, by the livestock operator authorized to graze NRL."

65-10 Grazing permits supposedly are a privilege. The permit does not grant a statutory right to use the public land permanently for the grazing of livestock if some other use is more beneficial in the long run. The protection of a watershed for a city is an example. Authorizing permittees to invest personal funds in fences, range reseeding and for other purposes creates what amounts to a lease-hold right upon property belonging to the public. It removes the complete freedom a federal agency ought to retain to make management changes without the restriction the lease holder may impose if a change should be necessary for the improved use of related resources. The private investment policy insures the tenure of the lease holder against a change of use and cancellation for other than a flagrant violation of the terms of his lease or permit.

"The Federal Government's title in the land should be kept absolutely free at all times. I do not believe we should encumber the title by any kind of leasehold interest based upon capital investment on the part of the lessee or permittee."

--Senator Wayne Morse, Speech in the U. S. Senate

The Oregon Environmental Council concludes that since the Draft EIS only is expressed in broad generalities on the impacts of livestock grazing has on the public lands in the State of Oregon, it does not fulfill the intent and purposes of Public Law 91-190.

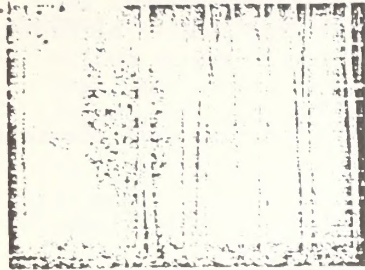
OREGON ENVIRONMENTAL COUNCIL
2637 S. W. Water Avenue
Portland, Oregon 97201
503/222-1963

Key No.

- 65-1 See item 3 on page IX-6 of the EIS.
- 65-2 The Boise Front Allotment Management Plan (AMP) was included as an example of an "activity plan" for achieving multiple use goals identified in the Bureau planning system. The Boise Front AMP was developed cooperatively by BLM, Forest Service, Idaho Fish and Game and the livestock operators. BLM provides \$2,000.00 per year to Idaho Fish and Game to assist with supervision of the AMP. General and specific goals of management are listed in the plan. Vegetation considered proper for the area is identified in the plan: perennial grasses and bitterbrush. "If" there is competition for forage between livestock and big game, the grazing system should partially mitigate the impact and provide additional forage for all animals. The historical livestock use described (Appendix page I-A-4) as "continuous yearlong" certainly must have resulted in much greater competition. The "critical use pressure" results from "large winter deer populations" (Appendix page I-A-5). It hardly seems then that "the real solution to this problem is removal of livestock" as proposed by respondent.
- 65-3 Interim management was very brief; the AMP was initiated almost immediately following its design. Only one pasture out of eight pastures is grazed as early as March 15 (interim management) and this early use will be rotated to other pastures in subsequent years so that the pasture receiving early use also receives ample "rest" and deferment for plant growth and development. Continuous early spring livestock use, year-after-year, is admittedly damaging to the vegetation and associated animals.
- 65-4 The Boise Front AMP, approved by a number of other concerned agencies and individuals, is proof of the enlightened recognition that livestock grazing under a management plan and properly designed grazing system is compatible with wildlife grazing in the same area.
- Planned range improvements are estimated to cost \$16,000.00 (not \$16,000,000.00). Estimated investment per AUM of \$25.00 is misleading; benefits accrue to wildlife, water, soil protection, downstream flood protection in Boise and other values and uses. To equate the investment solely to benefit AUM's is erroneous.
- The primary purpose of the investment in the Boise Front AMP is to provide multiple use management of the resource values involved (livestock grazing, watershed protection, wildlife habitat) and not to benefit a single use or dominant use. Livestock grazing can be controlled and managed to benefit other resources; it is a

Key No.

- 65-4 (cont.) legitimate multiple use of NRL that can be "managed" to be complementary to other multiple uses. Also, the Boise Front has been identified in the Bureau planning system as suitable for livestock grazing so "alternatives for other than continued use by livestock" have been considered resulting in the Boise Front AMP to properly manage this use.
- 65-5 Specific actions for livestock management and necessary supportive measures "to correct unsatisfactory conditions" are listed in Part I of the EIS. To establish a time schedule for accomplishments is difficult and depends on receiving necessary manpower, funds and cooperation to accomplish the task.
- 65-6 Agree that impacts on the land by livestock grazing wherever they occur differ only in their degree of severity. This is the premise for the programmatic statement on livestock grazing management whether that grazing management occurs in eastern Oregon or on the plains of Texas, as the reviewer has noted.
- 65-7 Each biome must be described in some consistent fashion to provide the framework in which the program is implemented and thus assess its subsequent impacts. The respondent is willing to accept statements from cited authorities on pages II-7 to II-10 as "factual and true" but unwilling to accept the statement on page I-3, lines 8 and 9, from an equally competent authority, as straying from facts. See also item 11 on page IX-12 of the EIS.
- 65-8 The vast majority of knowledgeable range scientists agree that use by domestic livestock can, indeed, be manipulated to bring about and hasten desirable ecological changes in the vegetative resource. The document does not advocate rest rotation grazing as the "salvation for all rangelands;" an infinite variety of other management actions are also included.
- Much of this statement by respondent is an expression of personal opinion and warrants no revision of the document.
- 65-9 The quoted statements in the EIS have been qualified by slight word revision. See page III-26 of the EIS.
- See also response to comment 60-12. Properly grazed ranges will generally result in an increase of plant density. Unless grazing animals utilize a reasonable portion of the forage production resulting from proper grazing management, the potential for wildfire increases. Also it should be noted, as pointed out in the response to comment 60-12, proper grazing management will result in replacement of undesirable plant species by those more preferable to grazing animals and less susceptible to fire.
- 65-10 See item 4, page IX-7 of the EIS.



by Ansel Adams in *This is the American Earth*

SIERRA CLUB

Mills Tower, San Francisco 94104

P. O. Box 467
Absarokee, Montana 59001
June 14, 1974

Director (330)
Bureau of Land Management
Department of the Interior
Washington, D. C. 20240

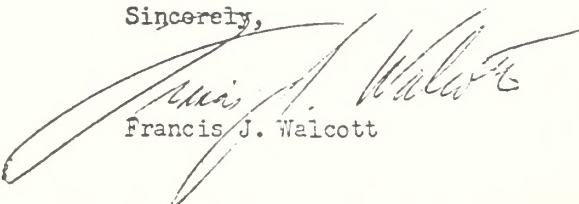
Dear Sir:

I enclose herewith comments on the draft Environmental Impact Statement for Livestock Grazing Management on National Resource Lands, on behalf of the Northern Plains Regional Conservation Committee of the Sierra Club. These views reflect the opinions of that Committee, and are, of course, generally with reference to situations and conditions in this region of the country.

We would appreciate your careful consideration of these comments in preparation of the Final Statement. Please send a copy of such Final Statement to me at my Absarokee address, noted above.

Thank you very much for this opportunity to comment on management of this important program.

Sincerely,


Francis J. Walcott

Part I:

Criteria for Developing and Implementing AMPs

- 66-1
- a) the potential for improving the watershed is clearly identifiable.
This criteria should be expanded to include prevention of any, or further deterioration of watersheds.
 - b) favorable cost-effect benefits and least-cost factors.
Those factors should determine priority in general, but high cost projects, where urgently needed, should not be rejected.
 - c) allotments where grazing reductions are imminent and the purpose of the AMP would be to prevent the need for reduction in livestock use.
This is, in essence, maintenance or improvement of range condition, and programs to achieve this need high priority.
 - d) critical wildlife habitat is deteriorating and the AMP will include a grazing system with specific objectives for improving wildlife habitat.
This needs high priority. Compatibility of wildlife and livestock should be sought wherever possible. Where significant conflicts exist plans are needed to reconcile such conflicts. Priorities should be determined on individual case basis.
 - e) increasing livestock forage production.
This should be accomplished, within limits of land capabilities under sustained yield considerations and with due weight to other resource values.
 - f) protecting and improving fisheries habitat.
This is one of the other important resource values which can and should receive special consideration without detracting from livestock uses.
 - g) availability of private funds to invest in range improvements that are unnecessary components of the AMP
Private investments to aid in carrying out the AMP should be encouraged, But must be limited to activities consistent with the AMP. Urgent activities must not be deferred because of the absence of such private funds.

Budget requests to implement the AMP program beyond funds from grazing fees should at least remain at present levels, and perhaps be increased, so as to expedite this important program, and to adequately manage and improve rangeland for other than livestock grazing objectives as well.

66-2 Although it is proper to prepare the AMP in cooperation with the livestock operator, there should be the opportunity for public comment whenever practical.

Part II

(page 4) Range condition, although mostly good to fair, suggests an urgency in developing good management plans for grazing of these lands. The importance of these lands to the nation make such planning imperative, to maintain productive capacity.

(page 15) Unique ecological areas and historical sites should receive special consideration as to any impact of the livestock grazing management program. The recognition of such special areas is good.

(p. 16) It may be true in part that the community must support the ranching industry, but this in no way leads to the implication that the industry is not important and essential to the national welfare and to the local community. It may well imply that the livestock raising industry is exploited by the nation. Alternative land uses could perhaps provide a temporarily greater local economic gain, but the loss to the nation of the livestock production involved would be significant and unacceptable. The local social benefits of maintenance of the livestock operation is also of major importance, and should also be recognized as part of a national heritage.

66-3 (p. 32) The Statement, under Vegetation, recognizes significant value to sagebrush, as well as other woody plants, and this raises questions as to the desirability of substantial eradication programs.

66-4 (p. 38) Wild horses, although part of the western heritage, are not a native species. Any management program should recognize this.

PART III:

The contemplated livestock management actions are all logical and appropriate, and appear to include all those which can best control a good livestock program. The supportive measures are also all appropriate to consider, and use where justified by conditions at the particular time and place.

(p. 8) Vegetative manipulation measures should be selected with care. Sagebrush removal, for example, has some undesirable effects. The values of such species are pointed out earlier in the Statement. These include major forage for pronghorn antelope, and utilization by domestic livestock and most wildlife in winter. Control of sagebrush by heavy fall grazing by sheep has been shown to be effective in some cases, and such control methods could and should be included in the AMPs. In the future, with institution of better livestock management practices, excessive sagebrush conditions should not develop.

The location of stock ponds, to better disperse livestock, and avoid excessive use of sensitive areas, is critical.

These and other factors in good livestock management programs emphasize the need for continued development of such plans, with careful consideration of all factors, and as wide a public involvement as possible.

(p. 9) The points raised here in the Statement suggest the desirability of thorough consideration of impacts, beneficial or adverse, of any proposed activity. Although not always feasible, a goal should be to utilize public involvement for any such planning of significant magnitude.

66-5 (p. 29) "livestock management actions are applied ... to provide the vegetation an opportunity to complete normal life processes..." - but some vegetation will be, according to the plans, specifically eliminated, thereby interfering with some "normal life processes".

66-6 "such management action is applied to permit plant physiological and ecological functions to proceed with a minimum of disruptions." This should be modified to read "to permit selected ... functions to proceed."

It must be recognized, though, that the actions planned and some modification of wholly natural procedures may be desirable to meet important and needed goals.

66-7 (p. 30) Management actions should not be used wholly to increase livestock numbers at the expense of wildlife, but should, as planned, permit maintenance of reasonable wildlife populations while continuing livestock operations at a reasonable level.

(p. 36) Any impacts from fence construction are negligible, and need no special consideration, although such activity should be carried out with proper caution.

66-8 An important potential impact from existence of fences is interference with wildlife movement, particularly affecting pronghorn antelope. Measures to minimize this are possible and should be included in the AMP. Construction should be such as to permit wildlife movement.

Vegetative manipulation is commented upon above.

66-9 (p. 38) No predator control program which meets objections while realizing the needed livestock protection has yet been suggested. Continued research to aid in livestock protection is urgently needed.

66-10 (p. 39) The question of roads vs. "vehicle trails" needs consideration - trails may cause less disturbance, but should be restricted to essential uses. If a vehicle track, or trail, is used instead of a bladed road, and only used sporadically, it is likely that less erosional damage will result than from a road. Greater usage will, of course, need a constructed road, but much of the real need is only for minimal use.

66-11 (p. 42) It is likely that livestock have a considerably less detrimental impact on the land than do vehicle operators and other recreationists, and such a relationship has greater significance than any impact of livestock numbers on recreation land uses and users - generally minimal, anyway.

66-12 (p. 56) There is insufficient discussion presented regarding any and all effects of changing vegetative composition, and various means of doing so.

The role of fire in range management and on the range ecosystem is only briefly mentioned, but it can have major effects, both beneficial and detrimental, by its presence or absence. Careful consideration should be given, both to controlled burning and to the degree of wildfire suppression.

(p. 57) Predator control measures in most areas are essential, but must remain under the direct control of responsible authorities, to the extent possible must be limited to target species, and must be effective at reducing livestock losses. On the other hand, it must be recognized that total control and prevention of all losses is not realistically achievable.

66-13 (p. 59) Aesthetic perception is too subjective to make adequate comment possible. What is pleasing to one person may be unpleasant to another, and what is beautiful to one may not interest another.

(p. 65) A major favorable result of the program will be its impact on maintenance of an important way of life in those areas of the country dependent upon livestock operations. This is more than a subjective value, as it is a way of life very limited in geographical extent, critical to those living it or living near it, part of the national heritage, and totally dependent upon this program.

Part IV:

- 66-14 (p. 4) Livestock needs and mitigation measures must take precedence over ORV and other recreation demands. If ORV use is likely to interfere with livestock such use must be prohibited, and gates, passageways and the like not provided. Much recreation use is not incompatible with livestock, and such use can continue.
- 66-15 (p. 5) Windmill use should be preferable to conventional power sources. Especially in view of energy shortages, and recognizing that windmills are, or could be, an effective power source, they should be utilized. The aesthetic impact of a windmill is highly subjective, and could be pleasing. Obviously, the design of the windmill must be such as to be highly effective.
- 66-16 Road standards could and should be kept minimum in places where use was restricted to that essential for livestock operations, and thereby detrimental impact could be minimized. In many cases mere wheel tracks are sufficient, or away from moist areas no set route of travel, providing use was infrequent, would be needed.
- 66-17 (p. 6) Vegetative manipulation and species removal should consider all effects including any ecological role of the target species. Any method of control should be carefully chosen.
- 66-18 (p. 8) Under natural conditions wildfire ignores soil moisture conditions. The results of controlled burning may not be the same. The potential hazards of wildfire are probably too great to permit much, if any, but any difference in results should be considered.
- 66-19 Predator and rodent control must have adequate supervision, or better, be under direct control of responsible authorities, but it must be responsive to needs, within the suggested restraints. Protection of rare, endangered, or threatened species is important.
- 66-20 (p. 9) "Truck trails" should be those of standards too low to permit the trucking of livestock. Where necessary, of course, low standard roads should be constructed. Trailing should be permissible where such activity will not result in excess resource damage. My point here is that a "truck trail" or occasional vehicle use, for maintenance purposes, is entirely appropriate, but such "trails" should be minimal, and not suited to heavier use. Where heavier use is needed, or trucking of livestock is essential, a better standard than such a "trail" is required.

Part V:

- 66-21 (p. 5) Hazards to ORV users may well exist if let-down panels are not lowered, but the average livestock operator is likely to have far more important things to do than lower let-down panels. It is not reasonable to expect this prior to a sudden major snowfall.

Prevention of unrestricted movement of ORVs is not necessarily an "adverse impact."

To the greatest extent possible, fencing should minimize the suggested adverse impacts on some wildlife. However, the advantages of such fencing are sufficiently substantial, probably to the impacted wildlife as well, to make such fencing desirable.

The aesthetic effects of such structures as windmills are subjective, and not

Pa. VI:

66-22 (Page 2) "Long term values of the site can be severely diminished or lost if disturbed/ before being thoroughly examined and documented" expresses the need for full consideration and review including full public involvement - a process not explicitly provided.

Part VIII:

Alternative A, Custodial - the probable result of this would be rapid deterioration of the range resource. It is a wholly undesirable alternative.

Alternative B, No Grazing - the vital importance of the livestock industry to the national and world food supply, and the essential nature of the range to continued livestock production make this alternative wholly unacceptable.

Alternative C, Maximize Livestock - this ignores other important uses of the land and is unacceptable.

Alternative D, Accelerated Program - may be preferable, as it accomplishes the worthwhile goals of the program sooner.

A few general comments are in order. The basic objectives of the program is to achieve and maintain desirable range condition for watersheds and wildlife habitat, and simultaneously to provide sustained yield of livestock forage. Essentially, this is to make the livestock operations compatible with wildlife and watershed objectives. This is wise and essential.

It is suggested that budget requests for additional funds beyond the return from grazing fees (which will and must reach fair market value) will remain at their present level. This may be inadequate.

It is also suggested that the AMPs, and the Management Framework Program, will be developed in cooperation with the livestock operator. There should be provision for input from all segments of the interested public.

66-23 There is little or no discussion of habitat for non-grazing wildlife - an important part of the range ecosystem.

66-24 There is no discussion of possible changes in water use, related to other needs and demands. With rapidly increasing demands for water, some estimation of such probable levels of need should be made, and some priority be guaranteed, beyond an approximately current level of domestic and municipal needs.

Generally the proposed program and the Draft Statement are very good, and should aid in maintenance of an essential livestock production industry.

Sierra Club
Northern Plains Regional Conservation Committee

Key No. 66

Key No.

- 66-1 Text revised. See pages I-7 and I-10 of the EIS. The comments by reviewer are consistent with Bureau policy and guidelines.
- 66-2 Public participation and comment is provided in the management framework planning for a particular planning unit. The extent of public comment on a particular allotment management plan is commensurate with the need identified through the public participation process on the total management framework plan.
- 66-3 Woody plants are desirable and necessary in many areas to provide both food and nesting environments. The problem comes when the woody species become dominant to the detriment of other necessary plants such as forbs and grasses. BLM vegetative manipulation projects are designed to favor the dominance of plant species within the plant community and not at eradication of a species.
- 66-4 Although wild horses are not considered a native species, Public Law 92-195 enacted by Congress on December 15, 1971 directs the Secretary of the Interior to protect, manage and control these animals as part of the thriving natural, ecological balance on public lands administered by the Bureau of Land Management.
- 66-5 It is doubtful that some vegetation will be specifically eliminated by livestock management actions. In those rare instances where a species is totally eliminated by management alone, it would indicate the species was poorly adapted ecologically and cannot compete. This situation may be true with certain annuals.
- 66-6 Text revised. See pages I-2 and III-21 of the EIS.
- 66-7 Agree. See criteria for developing and implementing AMP's on pages I-7 and I-10 of the EIS.
- 66-8 Agree. See EIS, Part IV--Mitigating Measures.
- 66-9 Accelerated research on predator-prey relationships and predator control methods has been undertaken by various institutions and agencies. Funds for required research must continue if many questions are to be resolved.
- 66-10 Many roads utilized in connection with the livestock grazing program will be "vehicle trails" as suggested by the reviewer. Minimal road construction to high standards is anticipated in support of the grazing program.

Key No.

- 66-11 The degree of detrimental impact of any use on the land, whether by recreationists or livestock grazing, is generally proportionate to the concentration of that use.
- 66-12 More detailed discussion on the subject of vegetative manipulation by mechanical and chemical practices in addition to Part III of the EIS is covered under separate Environmental Impact Statements being prepared by the Bureau of Land Management. In addition, a fire management programmatic statement is also under preparation at this time. Each of these Environmental Impact Statements will provide more detailed discussion on changing vegetative composition.
- 66-13 Agree with comment.
- 66-14 The extent that one legitimate resource use should take precedence over another will be determined by the management framework plan for a particular geographic area.
- 66-15 Text revised. Item 9, page IV-5 of the Draft EIS is deleted.
- 66-16 Agree with comment. See response 66-10.
- 66-17 All BLM projects have an environmental analysis record completed to determine if the project will have a significant impact on the environment before projects are carried out.
- 66-18 Text revised to clarify meaning. See page IV-5 of the EIS. The sentence refers to controlled burning and not to wildfire.
- 66-19 The discussion on page IV-6 of the EIS is in line with the reviewer's comment.
- 66-20 Text revised to clarify this subject. See page IV-7 of the EIS.
- 66-21 The statement says: Hazards to ORV's may exist if let-down panels (fences) are not lowered prior to heavy snowfalls. The comment suggests that the average livestock operator may not have time to do this prior to a sudden major snowfall--no difference in thought on this subject.
- 66-22 The statement does not suggest "review and full public involvement" - it states, in part, "--The site can be severely diminished or lost if disturbed before being thoroughly examined and documented." The Bureau program, under the planning system, would require a field examination by competent professionals (archeologists or historians, etc.). See also pages I-21 to I-23 of the EIS for discussion of the planning system, including public participation.

Key No.

- 66-23 Discussion on grazing impact to habitats important to "non-grazing" forms of wildlife are provided in 85-17 and 85-22.
- 66-24 We have portrayed the water requirement which will probably be necessary for the grazing of livestock, on pages III-11 and 12 of the EIS. The other items mentioned by the reviewer in this comment are beyond the scope of this statement.

by Ansel Adams in *This is the American Earth*

SIERRA CLUB

Mills Tower, San Francisco 94104

June 14, 1974

Mr. Curtis J. Berklund, Director
Bureau of Land Management
Department of the Interior
Washington, D. C. 20240

Dear Mr. Berklund:

The Sierra Club is pleased to offer our comments on the Draft Environmental Impact Statement, "Livestock Grazing Management on National Resource Lands, March 1974." We ask that the final impact statement be responsive to our comments, and please assure that we receive a copy. A few general comments about the draft EIS are in order.

The basic objective of this program should be to achieve and maintain desirable range conditions for watersheds and wildlife habitat and simultaneously to provide livestock forage on a sustained yield basis. Essentially, this means that livestock operations must be made compatible with wildlife and watershed objectives. The final EIS should more clearly reflect this basic policy.

If the full range of public benefits are to be provided on the BLM lands, the AMP's and the Management Framework Program must be developed in cooperation with the full range of the public, not just the livestock operator. While the livestock operator does have a vital interest, so do many others and their views must be equally considered.

67-1 The impact statement lacks a discussion of possible changes in water use, and there are no accurate figures as to the actual amount of water available to satisfy the various potential uses. The document should address what level of water use for various activities can be sustained and establish some priority list for such uses.

67-2 The biome descriptions in the document are not accurate, nor do they conform to the biome identification standards used by other Interior agencies. This should be standardized within the Department of Interior. Of particular importance is your failure to recognize that riparian habitat and association is part of each biome. As a result you have excluded a consideration of this type of habitat from the draft EIS.

67-3 The draft EIS states that there are substantial lands in the desert which could be converted to productive agricultural use by irrigation. Where are those lands, and what are the acreages?

67-4 The draft EIS does not adequately recognize the value of predators on BLM lands, particularly the potential of predators to control rodents.

67-5 The EIS also fails to evaluate the impact of alternative management approaches that involve the same amount of, or less, grazing than presently occurs. The draft

67-5 EIS projects a fairly dramatic increase in the amount of grazing on western range
(cont.) lands as a result of implementing this proposal. While this may be feasible on
certain range lands, it is completely infeasible on others. We are of the opinion
that much of the hot desert should not be grazed at all and therefore strongly
disagree with your contention that grazing in this area should be increased by 56%
by 2010. The increases in grazing projected for the southern grasslands and the
mountains of Arizona and New Mexico seem equally unrealistic. The document should
address the possible benefits which would accrue if livestock use were stabilized
or reduced under an active management program on some BLM lands.

67-6 The draft EIS does not address what will happen during periods of stress,
such as what will happen when we have lower than average rainfall. Southern
Arizona and New Mexico have been suffering from drought and some of the range
lands are in very bad condition. The statement should discuss standards and
criteria for reducing grazing during periods of less rainfall and forage produc-
tivity.

67-7 The supporting measures needed to achieve the projected levels of grazing
use could be most harmful under certain conditions, and the effects of these pro-
grams must be addressed in this impact statement, not just put off until after
the decision of which course to pursue is already made. The EIS does not describe
how much each of these treatment programs and supportive measures contribute to
increased productivity of range lands. The more intelligent choice to balance
the various multiple uses on these lands might well be no chemical treatment or
pinyon-juniper chaining with a resultant lower level of grazing use. But the
information is not developed in the draft EIS which would enable someone to intel-
ligently evaluate such alternatives.

67-8 Also the statement does not outline a carrying capacity for the land under
consideration. What is the maximum carrying capacity of livestock or wild horses
or coyotes which these rangelands can sustain without unacceptably affecting other
uses? If coal strip-mining occurs, how much land will be removed from production
of forage for livestock? How much of a reduction in livestock grazing will be
necessary if substantial acreage is devoted to coal production? This statement
suffers because the impacts of various alternative commitments of BLM lands have
not been quantified.

The other remarks which we have are referenced to specific sections of the
draft EIS. They are as follows:

Part I: Criteria for Developing and Implementing AMPs

- 67-9
- (a) The potential for improving the watershed is clearly identifiable.
This criteria should be expanded to include prevention of any or
further deterioration of watersheds.
 - (b) Favorable cost-effect benefits and least-cost factors.
These factors should determine priority in general, but high cost
projects, where urgently needed, should not be rejected.
 - (c) Critical wildlife habitat is deteriorating and the AMP will include a
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This needs high priority. Compatibility of wildlife and livestock
should be sought wherever possible. Where significant conflicts exist
plans are needed to reconcile such conflicts. Priorities should be
determined on individual case basis.

- (d) Increasing livestock forage production.
This should be accomplished, within limitations of land capabilities, under sustained yield considerations and with due weight to other multiple use resource values.
- (e) Protecting and improving fisheries habitat.
This is one of the other important resource values which can and should receive special consideration without detracting from livestock uses.

Budget requests to implement the AMP program beyond funds from grazing fees should at least remain at present levels, and perhaps be increased, so as to expedite this important program and to adequately manage and improve rangeland for other than livestock grazing objectives, as well.

67-10 | Although it is proper to prepare the AMP in cooperation with the livestock operator, there must be opportunity for public comment and input.

Part II:

[Page 4] Range condition, although mostly good to fair, suggests an urgency in developing good management plans for grazing of these lands. The importance of these lands to the nation make such planning imperative in order to maintain productive capacity.

[Page 15] Unique ecological areas and historical sites should receive special consideration as to any impact of the livestock grazing management program. The recognition of such special areas is good.

[Page 16] Alternative land uses other than grazing could perhaps provide a temporarily greater local economic gain, but the loss to the nation of livestock production involved would be significant and unacceptable. The local social benefits of maintenance of the livestock operation is also of major importance and should also be recognized as part of a national heritage.

67-11 | [Page 32] The statement, under Vegetation, recognizes significant values of sagebrush, as well as other woody plants, and this raises questions as to the desirability of substantial eradication programs.

[Page 38] Wild horses, although part of the western heritage, are not a native species. Any management program should recognize this.

Part III:

The contemplated livestock management actions are all logical under appropriate conditions and appear to include all those which can best control a good livestock program. The supportive measures are appropriate to consider but should be used only where justified by conditions at a particular time and place.

[Page 8] Vegetative manipulation measures should be selected with care. Sagebrush removal, for example, has some undesirable effects. The values of such species are pointed out earlier in the Statement. These include major forage for pronghorn antelope, and utilization by domestic livestock and most wildlife in winter. Control of sagebrush by fall grazing

by sheep has been shown to be effective in some cases, and such control methods could be included in the AMPs. In the future with institution of better livestock management practices, excessive sagebrush conditions should not develop.

The location of stock ponds to better disperse livestock and avoid excessive use of sensitive areas is critical.

These and other factors in good livestock management programs emphasize the need for continued development of such plans, with careful consideration of all factors, and as wide a public involvement as possible.

[Page 9] The points raised here in the Statement suggest the desirability of thorough consideration of impacts, beneficial or adverse, of any proposed activity.

67-12 [[Page 29] "Such management action is applied to permit plant physiological and ecological functions to proceed with a minimum of disruptions." This should be modified to read "to permit *selected* ... functions to proceed."

[Page 30] Management actions should not be used wholly to increase livestock numbers at the expense of wildlife, but should, as planned, permit maintenance of abundant wildlife populations while continuing livestock operations at a reasonable level. The principle of sustained yield and multiple use must govern all decisions.

An important potential impact from existence of fences is interference with wildlife movement, particularly affecting pronghorn antelope. Measures to minimize this are possible and should be included in the AMP. Construction should be such as to permit wildlife movement.

[Page 38] No predator control program which meets objections while realizing the needed livestock protection has yet been suggested. Continued research to aid in livestock protection is urgently needed.

[Page 39] The question of roads versus "vehicle trails" needs consideration -- trails may cause less disturbance but should be restricted to essential uses. If a vehicle track, or trail, is used instead of a bladed road, and only used sporadically, it is likely that less erosion damage will result than from a road. Greater usage will, of course, need a constructed road, but much of the real need is only for minimal use.

67-13 [[Page 56] There is insufficient discussion presented regarding any and all effects of changing vegetative composition and various means of so doing.

The role of fire in range management and in the range ecosystem is only briefly mentioned, but it can have major effects, both beneficial and detrimental, by its presence or absence. Careful consideration should be given both to controlled burning and to the degree of wildfire suppression.

[Page 57] Predator control measures must remain under the direct control of responsible authorities, must be limited to target species, and must be effective at reducing livestock losses. It must be recognized that total control and prevention of all livestock losses is not realistically achievable.

[Page 65] A major favorable result of the program will be its impact on maintenance of an important way of life in those areas of the country dependent upon livestock operations. This is more than a subjective value, as it is a way of life very limited in geographical extent, critical to those living it or living near it, part of the national heritage, and dependent on this program.

Part IV:

[Page 5] Windmill use should be preferable to conventional power sources. Especially in view of energy shortages and recognizing that windmills are, or could be, an effective power source, they should be utilized. The aesthetic impact of a windmill is highly subjective and could be pleasing. Obviously, the design of the windmill must be such as to be highly effective.

Road standards could and should be kept minimum in places where use was restricted to that essential for livestock operations, and thereby detrimental impact could be minimized. In many cases mere wheel tracks are sufficient.

[Page 6] Vegetative manipulation and species removal should consider all effects, including any ecological role of the target species. Any method of control should be carefully chosen.

[Page 8] Under natural conditions wildfire ignores soil moisture conditions. The results of controlled burning may not be the same.

Predator and rodent control must be under direct control of responsible authorities. Protection of rare, endangered or threatened species is imperative.

[Page 9] "Truck trails" should be those of standards too low to permit the trucking of livestock. Where necessary, of course, low standard roads should be constructed. Trailing should be permissible where such activity will not result in excess resource damage.

Part V:

[Page 5] Prevention of unrestricted movement of ORVs is not necessarily an "adverse impact."

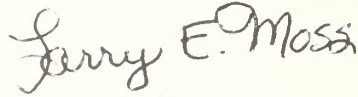
The aesthetic effects of such structures as windmills are subjective and not necessarily adverse.

Part VI:

[Page 2] "Long term values of the site can be severely diminished or lost if disturbed before being thoroughly examined and documented" expresses the need for full consideration and review, including full public involvement -- a process not explicitly provided.

Again, thank you for the opportunity to comment on the draft EIS, and we look forward to your final environmental impact statement which more fully quantifies and explains the effect of your proposed programs.

Yours truly,

A handwritten signature in dark ink, reading "Larry E. Moss". The signature is written in a cursive style, with the first name "Larry" being more prominent and the last name "Moss" following it.

Larry E. Moss
Associate Conservation Director

Key No.

- 67-1 Changes in water use, amount of water available for various uses, sustained water use for various activities and priority listing of such uses is beyond the scope of this EIS.
- 67-2 The biome descriptions were abstracted from the published literature and were assumed, therefore, to be accurate. These biome descriptions have been fairly standard parts of several statements issued by the Department of the Interior.

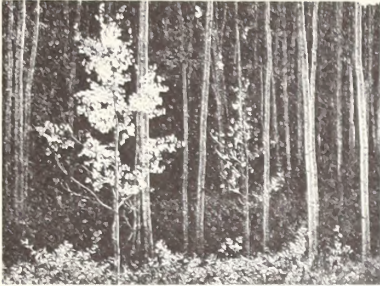
Although the aquatic habitat per se was not discussed, the water resources and impacts of grazing on streambanks and water in each biome was briefly discussed. It would be almost impossible to discuss each of the different kinds of habitat for the various species of wildlife. If the aquatic habitat was discussed in detail for various species, then it would also be appropriate to discuss terrestrial habitats in some detail.

- 67-3 It is not the purpose of this document to pinpoint potential agricultural areas. However, resource analysis of geographic planning units located in each district do identify such areas. These potentially irrigable lands are scattered throughout all the western national resource lands. It is unlikely that water for irrigation will ever be available to convert many of these lands to agricultural development.
- 67-4 Text revised. See page III-28 of the EIS.
- 67-5 The potential for improving vegetative production on the hot desert is significant in view of present range conditions. An increase of 352,000 AUM's of livestock forage grazing capacity represents about 10 AUM's for each square mile of usable range.

The percent increase of AUM's in the hot desert, from 1970 to 2010, may not be a critical indicator of productive stress on the resource base. In 1970 the hot desert NRL produced .028 AUM's per acre, while the desert biome NRL as a whole produced .060 AUM's per acre. The projection to 2010 on the same land base would indicate production rates of .044 AUM's per acre in the hot desert and .085 AUM's per acre in the desert biome as a whole. While the relative increase in the hot desert may be greater in the future because intensive management levels have been less in the past, the overall productivity of the hot desert is expected to be about half that of the cold desert.

Key No.

- 67-6 Management actions shown on page I-2 of the EIS are applicable to periods of stress such as drought if proper range management is to be accomplished. See also page IV-1 concerning grazing regulations for the public lands.
- 67-7 As stated on page I-1 of the EIS, the statement relates to the livestock grazing management program administered by BLM. The statement analyzes the environmental impact of this program. The impact of supportive measures is described in Part III. The application of these supportive measures for specific allotments will not be considered until the allotment management plan is designed and implemented within the constraints of the management framework plan and environmental analysis procedures. It is at this point that alternatives for supportive measures are properly evaluated and the impacts identified in the programmatic statement are quantified.
- 67-8 It is not possible for a programmatic EIS on livestock grazing to "crystal ball" the impacts of other programs on livestock grazing. These necessarily must be treated by implementation of local resource management plans guided by overall policy goals and direction. Pages I-21 through I-23 of the EIS address the reviewer's comment.
- 67-9 Text revised regarding criteria for developing AMP's on watersheds. See page I-9 of the EIS.
- 67-10 Following public comment and input on the management framework plan which directly relates to general activity planning, those individuals, groups or agencies who are directly affected by a specific AMP are consulted to the extent practicable.
- 67-11 The EIS does not advocate substantial eradication of woody plants except as necessary to restore productivity to seriously depleted productive land or to implement an intensive management program. Even in those localized areas where brush control is necessary, "islands" would be retained adequate for wildlife species cover and aesthetic beauty.
- 67-12 Text revised regarding management actions applied to permit selected plant functions to proceed with a minimum of disruptions. See page III-21 of the EIS.
- 67-13 Programmatic statements are under development that will address this subject in more detail (i.e., fire management and vegetative manipulation).



by Ansel Adams in *This is the American Earth*

SIERRA CLUB Mills Tower, San Francisco 94104

July 11, 1974

Mr. Curtis J. Berklund, Director
Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Dear Mr. Berklund:

Although the Sierra Club was not informed by the Bureau, we recently learned that you extended the time for public comment on the draft environmental impact statement on "Livestock Grazing Management on National Resource Lands" until July 16.

We have further analyzed the EIS and would like to submit additional comments on the document. I would like to have these additional comments considered along with our letter of June 14 and we hope the final impact statement will be responsive to our comments. Our comments are referenced by page number and paragraph and general comments follow the specifically referenced comments.

Page I-2

68-1 | Paragraph one. The goal of AMP is not only to maintain desirable range conditions for water sheds and wildlife habitat, but should also benefit recreation, preservation and other multiple use values.

68-2 | Paragraph two indicates that full implementation of the AMP program will occur by the year two thousand. If the deficiencies which the Impact Statement indicates are in existence now, it is unconscionable to require over a quarter of a century for them to be corrected.

Page I-3

68-3 | Paragraph one. The list of management practices does not include any research component and does not mention additional practices such as sagebrush eradication, juniper pinon eradication, soil ripping and so on.

Paragraph two. The list of management options which may be included in a grazing system, include "removal of livestock entirely from a part of an area in order to protect critical wildlife habitat". Such removal may also be required to protect the livestock from poisonous plants or feed conditions which lead to bloat and other problems.

Page I-4

68-4 | Paragraph 3. The statement that "overgrazed ranges will improve more rapidly with proper livestock grazing than with no livestock grazing" doesn't mention that overgrazed ranges can be improved by options which are broader than the grazing or no grazing options which that statement presumes.

68-5 Paragraph 5. What is the fate and distribution of the 10 million acres administered by the Bureau of Land Management which are not suitable for livestock grazing.

Page I-5

68-6 This table indicates that certain supportive measures are needed for optimum development of the AMP program. These measures include the construction of 5500 miles of additional roads and over 4,000 miles of additional trails but there is no reason to believe that the Impact Statement has considered the detrimental effects that additional roads and trails may have on grazing or any other multiple use. Certainly some of these roads and trails will result in increased competition between recreation and grazing.

Page I-6

68-7 Table 1-2 would give a better, although not perfect, comparative relationship between the various states if it included a state by state ratio of AUM'S to acres.

Page I-7

68-8 Paragraph one. The ability of the NRL to contribute to the nation's red meat needs is an unquantifiable goal because there is no indication of what the needs really are. I think that the impact statement should differentiate between the nation's needs, in terms of protein requirements, for health, and its demands which may be unrelated to physical or health needs.

68-9 Paragraph two. The "specific multiple use management goals" are typically not specific. A numerical goal might be established for cattle or sheep numbers, but AMP ordinarily is not specific in terms of recreational carrying capacity numbers or wildlife population numbers or most other multiple use goals. Most of the goals may be pre-determined but they can be usefully quantified.

Page I-8

68-10 Paragraph three. It is alleged that request for AMPs from livestock operators have grown, but it is also certainly true that a number of livestock operators are opposing the implementation of new AMPs. The impact statement does not give any indication of the success or acceptability of the AMP program even though some operators have been under the program since 1935. The projected benefits would be more substantially

documented if the nine years of experience was reviewed to determine the past impact.

Page I-9

68-11 | Paragraph two. Twenty million acres are characterized as having an "adequate" level of livestock grazing management now, but it is not clear whether or not "adequate" also refers to another multiple use goals. There is also no discussion of what constitutes an adequate level of livestock grazing management. It is also stated that an additional 20 million acres are estimated to need only changes in season of use, class of livestock and portions of allotments excluded from livestock grazing. How much of the 20 million acres will require exclusion of livestock grazing? A subsequent comment that 68 million acres will require management actions involving more detailed grazing systems does not mention potential reduction in grazing or exclusion.

Page I-12

68-12 | The entire first paragraph is badly written. A "focus on improving watershed conditions" does not sufficiently identify potential actions. Such actions could include everything from building dams across major rivers to eliminating recreational use of upper watershed areas. The guideline criteria should give some indication of the limitations of the program. The same paragraph indicates that "critical wildlife habitat is deteriorating", but it is clear that wildlife habitat is generally deteriorating. What separates critical from non-critical wildlife habitat? A perhaps more substantial deficiency is the reliance upon the "availability of private funds to invest in range improvements that are necessary components of the AMP". The expenditure of private money for capital investment on public lands creates an obligation on those public lands which may prejudice the use of those lands for other public purposes. If the improvements are necessary components of AMP, the tax payer should provide those improvements and recover the investment in the grazing or lease fees. It is my opinion that we ought to protect ourselves from the political pressure created by the investment of private monies on public lands.

68-14 | Paragraph two. The 1964 range condition and trend data should be broken down by state and possibly by grazing districts.

68-15 | Paragraph three. The estimated \$4,500 of private funds to be spent on each AMP should be broken down to determine whether most of the funds would go to water development or vegetation manipulation or fence or other improvements. The cost-sharing between federal and private

68-15 sources is fictitious since many of the public benefits cannot be quantified,
(cont.) and it is a bad policy because of the problems concerning private money investment which have been previously described.

Page I-13

68-16 The table gives estimated forage conditions but for livestock only. What about forage conditions for wildlife. The table also mentions the woodland-bushland biome which may be better for deer habitat without the footnoted treatment then it will ever be for cattle. The coniferous forest biome almost certainly needs some burning similar to what is mentioned in footnote "C" for the woodland-bushland biome.

Page I-14

68-17 The first paragraph should give the amount of the grazing fee which is currently being expended for range improvement programs. The third paragraph mentions the "private forage value index". This should be given. In the fourth paragraph there is no way of telling if the 13 cent increase in the "forage value index" is a true increase or a percentage increase which can be attributed to general inflation.

Page I-15

68-18 The second paragraph makes an assumption which will fully commit the available range forage supply. There should be some uncommitted percentage which can be reserved for use during drought or as so-called "swing" allotment forage to handle circumstances where livestock must be moved from areas which for one reason or another become unavailable or unsuitable for the originally planned livestock use. How much of the available forage supply will be lost to mining activity, off-road recreational vehicle impact and other decreases? If the proposed minimum increase of 3.5 million AUMs is predicated on total use of the currently available land base, then that projected increase will fail because at least part of that land base will be lost to mining and so on.

Page I-16

68-19 The table clearly indicates that the cost of administering a grazing program is greater than the income. This is not necessarily a deficiency since some of the costs will go to support public values on the public lands.

Page I-19

- 68-20 The first and second paragraphs which discuss the historic grazing of the ecosystems by indigenous wildlife should give some idea of the number of wildlife AUM compared to the current domestic AUM.

Page I-24

The third paragraph indicates a "broad" acceptance by game management agencies and conservation groups of the allotment management plan program. There is some question as to how "broad" that acceptance really is.

Page I-27

- 68-21 The second paragraph indicates that "irreversible actions to halt deterioration will not be taken without an MFP". Does this statement mean that irreversible action is not justified if the deterioration is irreversible? The statement seems inflexible even though a particular situation may require the foreclosed response.

Page II-1

- 68-22 The second paragraph indicates that the extent of livestock grazing on NRL can be influenced by the "demand" for livestock forage. Is the "demand" ever less than 100% of the available forage?

Page II-4

- 68-23 The desert biome discussion should give temperature limits by number instead of using phrases like "very hot in summer" and "very cold in winter".

Page II-6

- 68-24 The second paragraph discussion of urban encroachment on some forest areas is too restrictive. Urban areas and urban uses are encroaching on all areas.

Page II-10

- 68-25 The second paragraph refers to destructive changes in "native" ranges. What is the distinction between a native and a non-native range? The next sentence indicates that the natural state in rangelands was reached and maintained under grazing, but there is no indication of the level or intensity of that grazing.

Page II-15

68-26 The footnote indicates that the National Register of Historic Places should be consulted to determine if historical properties are affected by the live-stock grazing management program. Such a reference is inappropriate in an impact statement. The reader should be able to determine the impact of the grazing program by reading EIS and should not be sent elsewhere.

Page II-16

68-27 The entire discussion of social interrelationships is best described as superficial.

Page II-25

68-28 The second paragraph regarding the burning of coal inside or outside of biome should be quantified. It is unlikely that "most of the coal is shipped outside the biome for consumption in steam plants to produce electric power" can be supported. It is incorrect to state that "the coal in this region is relatively free of sulfur emissions when burned." Most of the coal in a region exceeds the sulfur content standards of the State of New Jersey, for example, and the relative emissions cannot be considered unless there is a relative comparison of BTU per pound. Coal with less sulfur content than other coal will have an equivalent sulfur emission if more of it must be burned.

Page II-37

68-29 The fifth paragraph indicates that cattle numbers have steadily increased over the years. In New Mexico cattle numbers have been almost identical from year to year since 1935. Why are cattle numbers up elsewhere?

Page II-40

68-30 The impact statement should give some indication of why "per capita income in the plains of New Mexico is only about 70 percent of the western states' average." (last paragraph).

Page II-45

68-31 Paragraph two repeats the implication that the areas' coal can be considered low sulfur. It also failed to point out that there are enormous deposits of low sulfur coal in the East.

Page II-47

68-32 The first sentence on the page does not make sense.

Page II-57

- 68-33 | The mineral discussion begins with a statement that the predominant mineral resource now being mined in the hot desert biome is copper. Is the predominance a predominance of dollar value, or tons mined, or area being mined?

Page II-58

- 68-34 | The statement in the first paragraph that thin soil cover makes it easy to explore for minerals is inaccurate.

Page II-65

- 68-35 | It is contended in the third paragraph that the desert is essentially lacking in plant succession. That statement is inaccurate. Much of the desert has relict vegetative stands which can be colonized if they are destroyed and they are adjacent to other plant forms.

Page II-66

- 68-36 | The last sentence on the page indicates river bottoms and flood plains include some 32 kinds of birds but there is no listing of the varieties.

Page II-67

- 68-37 | The second paragraph has a citation for the presence of reptiles. Citation 41, however, is far too limited to support the statement.

Page II-68

The last sentence on the page indicates that sheep grazing occurs but is limited to the winter season. This is not correct for lands on or near the Navajo Reservation.

Page II-69

- 68-38 | The first paragraph indicates that grazing increases during the brief period when annuals are available but personal observation indicates that grazing tends to be constant and not related to an unusual abundance of annual plants. This is especially true in regard to Indian livestock.

- 68-39 | Discussion on wild horses and burros indicates that competition for forage with other grazing animals is prevalent and yet the statement indicates that there are only 10,000 animals located in three western states. How prevalent can the competition be?

Page II-70

- 68-40 | The first paragraph mentions soils as often being warm enough for the
68-41 | growth inactivity of micro-organisms. It is also true that soil conditions
| are often too warm. A discussion of human concerns indicates that the
| national growth rate is 13.3 percent. It is inconcievable that the national
| population growth rate is that high.

Page II-72

- 68-42 | The fourth paragraph which indicates the deficiency of data needed to under-
| stand the nutrient cycle throws into question the ability to predict the impact
| of the grazing management program in that biome.

Page II-73

- 68-43 | The third paragraph discusses large areas of irrigable soils which remain
| unirrigated in the desert because of inadequate water supplies. Typically
| desert irrigation of almost any type proves to be environmentally irrespon-
| sible and economically indefensible. The presence of water is not the only
| determinant of what is or is not an irrigable soil.

Page II-74

- 68-44 | The second paragraph mentions heavy use of water in the biome for recrea-
| tion use. Isn't agriculture far and away the major user? It is interesting to
| note in the following paragraph that although population in the urbanized area
| increased by only 165%, the increase in the urbanized geographic area
| increased by 350%. This should indicate the magnitude of the growing
| problem between the grazing land base and the urban land base. The same
| sentence stated also that large areas of rural land may be required for
| expansion of metropolitan areas. The experience in New Mexico is that
| as many as one million acres of rural land may already have been platted
| and subdivided so the commitment for expansion has largely been made.

Page II-79

- 68-45 | The first paragraph describes the Yavapai and Paiute peoples as hunting-
| gathering peoples. Can it be realistically stated that this is their current
| mode of living?

Page II-85

The second paragraph gives a runoff range of 0.1 to 5.0 inches per year. Without some kind of frequency index, this range of 50 to 1 is meaningless.

68-46

The next paragraph describes average concentration of stream flow but there is not indication whether the stream flow is perenial or intermittent.

Page II-90

68-47

Second paragraph indicates that changing land uses have allowed woodland communities to expand. Examples of changing land uses should be given.

Page II-105

68-48

The discussion of minerals at the bottom of the page omits the rather substantial effect that mining mineral processing and refining has had in the area near Hurly, New Mexico which is within the biome. The discussion continues on the next page and indicates that there are waste and tailings disposal problems but neglects that waste and tailings disposal has consumed grazing land.

Page II-111

68-49

The discussion of vegetation under the category of living components mentions a relatively continuous canopy over the forest floor. On the next page this can be contrasted to "continuous cycle" to which the coniferous forest is adapted including "fire kill". Man's fire management is an unnatural force which results in a more intense canopy and to which the coniferous forest is not adapted. Base line descriptions of bio-characteristics should not avoid discussion of man's role in changing the basic dynamics which originally shaped the biome.

Page II-112

68-50

The fifth paragraph mentions that the montane forest includes large areas administered for recreation and wilderness uses but neglects to mention grazing.

Page II-114

68-51

The discussion on domestic livestock grazing indicates that such grazing occurs on mountain meadows throughout the biome but fails to mention that grazing often also concentrates along stream and river bottoms.

Page II-115

68-52 The second paragraph indicates that portions of the coniferous forest were withdrawn from grazing for watershed protection purposes. This should be documented and some indication of the amount of the livestock decline should be given. The paragraph also indicates that a trend toward additional withdrawals could continue as demand for water increases in the west. Since demand for water in the west already exceeds the supply, it is difficult to understand why there should be additional withdrawals.

Page III-2

68-53 The first paragraph indicates that grazing can result in soil compaction. It can also pulverize existing soil and make that soil more susceptible to wind and water erosion. The first paragraph also mentions the deposition of animal waste on the soil surface, introducing "foreign" pathogens into the soil. What are "foreign" pathogens?

The second paragraph, in the last line on the page, mentions the effect of a decrease in cover on runoff and sediment load. It should be pointed out that not only is the magnitude of the runoff increased, but the duration of the flow is decreased. This can extend periods of dryness.

Page III-8

68-54 The second paragraph indicates that a tree crusher or root plow will virtually eliminate overland flow and sediment production for a period of time. This is only true so long as the precipitation does not exceed the ability of the disturbed soil to absorb moisture. Typically in many parts of the country, particularly in the Southwest, disturbed soil left from tree crusher or root plow is virtually wiped out in the first thunder storm and silt and sediment production is very large.

Page III-9

68-55 A supportive measure which disturbs vegetation and soil is the development of additional watering sites. With that development, however, comes the potential for trail cutting by sheep and cattle going for water. This can begin or accelerate erosion in localized areas and can also result in the concentration of manure along these trails.

Page III-10

68-56 The third paragraph indicates that pasture rotation will result in animal excreta being deposited into a water course at only one point. This may be true, but it is just as likely that a rotation will merely move cattle from one point to another along the same stream so that the total water course is always receiving a dose of animal excreta.

Page III-11

68-57 Paragraph one indicates that water pollution potential from animal wastes in grazing pastures should be minimal, however, a previous statement has indicated that as demand for water increases, additional withdrawals may be necessary. These two statements should be resolved.

Page III-14

68-58 The second paragraph indicates right-away clearings may result in short-term water quality degradation but the fact is that that degradation could be very persistent if vegetative recovery is slow or the right-away is in an area where cover cannot be re-established for many years.

Page III-15

68-59 The last paragraph indicates an additional 18,400 acre feet of water will be required by 1990 under the AMP program but it is not clear whether the increase in water consumption is directly proportional to the increase in cattle or sheep. What is the point of diminishing returns for water development?

Page III-19

68-60 The first paragraph indicates potential increase in dust pollution because of a greater probability of drought following pasture use under rotation. There should be some discussion of the relative recovery rates of pastures used in rotation in the different biomes and some indication as to whether or not the same degree of forage utilization should be permitted in areas which are susceptible to drought.

Page III-23

68-61 The first paragraph indicates that removal of livestock "may be beneficial" to vegetation. The use of the word may is far too vague.

Page III-29

68-62 The discussion on predator control in the fourth paragraph indicates that predator control practices have no influence on vegetation. This is an interesting statement because it is widely believed that predators have some affect on grass eaters other than livestock. The statement is further confused by an indication that "rodent control" will be beneficial to vegetation. How then can predator control practices, which control rodents, also be beneficial to vegetation?

There should be some indication of what the environmental impact of predator control is generally.

Page III-38

68-63 | The last paragraph indicates that predator control has been effective in aiding the re-establishment of some wildlife species in some areas and that the survival of young has been enhanced by predator control. Since many of the rather mundane statements throughout the impact statement are given citations and documentation, this rather controversial one should also be documented.

Page III-39

68-64 | The first paragraph's discussion of rodent control fails to understand that rodents are wildlife. The second paragraph indicates access roads will allow better harvests of big game and result in a more balanced ecosystem. What is a "balanced" ecosystem in the context of that paragraph? The last paragraph indicates the development of additional water to implement a management system as beneficial to wildlife. It can also be said that the development of additional water, for any reason, whether to implement a management system or not, is beneficial for wildlife.

Page III-40

68-65 | The first paragraph indicates access for hunters will permit better harvest of excessive numbers. The statement fails to indicate that access will also permit "better" harvest of scarce numbers.

Page III-43

68-66 | The fifth paragraph indicates that roads and trails can have a beneficial impact on livestock by opening up areas to grazing that were inaccessible or very difficult to reach. As a practical matter, almost any area could be reached by a cow or sheep and that inaccessibility is a very "man oriented" term.

Page III-44

68-67 | The discussion of wild horses and burros fails to indicate that one management action is to control the number of horses and burros.

Page III-46

68-68 | The fifth paragraph indicates populations of wild horses and burros have probably increased without specific predator control programs for their benefit but fails to mention that the increase has been concurrent with the predator control for the benefit of livestock.

Page III-50

68-69 | The second paragraph indicates that there would be an increase in annual earnings to the livestock industry of \$4,150,000. It should be pointed out that this does not even meet the current rate of inflation. Because many ranchers, perhaps most ranchers, operate under a colossal debt and owe money to banks which in turn must borrow large amounts from outside a rural area, it is quite possible that an increase in income will have an affect in the banking system at some distant location and that the major economic affect will not be in the local rural area as the paragraph argues.

Page III-51

68-70 | The first paragraph indicates that annual earnings in the livestock industry would increase by \$1,100,000 when multiplier effects are used, but the multiplier is not given.

Page III-52

68-71 | The third paragraph indicates that a reduction in cattle number may eliminate serious competition with wildlife, wild horses, burros and recreationists, but fails to mention that recreationists might also be reduced as a viable management tool.

Page III-53

Deferral of livestock use of an area until after recreation season must take into account the proper season for the utilization of the forage. All livestock deferral should take into account factors other than competition with recreation. Deferral in addition to reducing conflict with recreation, may be beneficial by reducing disturbance at caving and lambing times and so on.

Page III-54

68-72 | The second paragraph indicates that tumbleweeds against the fence may alter temperature moisture conditions in the microclimate but fails to indicate whether the changes would be for better or for worse or even what they would be biologically.

The third paragraph indicates that water developments can be focal points for the attraction of wildlife thereby increasing viewing opportunities but fails to indicate that it can also result in a concentration of hunting activity.

Page III-56

The first paragraph states that debris scattered over the landscape restricts movement of game and livestock, but it appears clear that scattered debris should not have any particular affect.

68-73

The second paragraph indicates that chemical spraying to eliminate poisonous plants benefits grass growth, but it is unlikely that any spray is selective to poisonous plants. Therefore there is always a loss of beneficial vegetation. There should be more discussion about such trade-off.

Page III-57

The discussion of predator control in paragraph four does not differentiate between a reduction of predator populations or individual predators which prey on cattle. This is a basic policy question which should have been resolved by the Cain Report but it is clear that many agencies still do not comprehend the philosophy of individual predator control as opposed to a reduction in predator populations.

Page III-58

68-74

The third paragraph indicates that uniform utilization of grazing relieves grazing pressure near streams and reservoirs and other areas of concentration. The paragraph apparently confuses uniform utilization with sequential utilization since a frequent result of distributing grazing is that more desirable areas i.e. those near water are utilized first and are utilized completely. The pressure remains the same in the long run.

Page III-59

68-75

The first paragraph indicates that access for hunting is a benefit and that vegetation manipulation can result in a more scenic hunting or viewing area. There is a basic difference between hunting opportunity and hunting success and many people consider hunting quality to be adversely effected by an increase in roads and competition between hunters. The second paragraph gives three ways in which elements of landscape character can be effected but failed to mention the fourth which is that water may be introduced or removed.

Page III-61

68-76

Figure III-14 should be explained so that land on either side of the fence can be characterized by the treatment it received.

Page IV-1

68-77 The third paragraph says that management actions or measures will not be applied in situations which create a significant conflict with other uses or degrade the environment. The philosophy is incomprehensible. Management decisions and measures must be applied if the basic resources are being destroyed and there is no way out of making those hard decisions.

Page IV-2

68-78 The third paragraph failed to indicate that forcing utilization of less preferred plants may create over utilization of others.

Page IV-3

68-79 The first paragraph mentions excess forage production but it is difficult to imagine any forage being considered "excess".

The second paragraph mentions the use of short-term leases and contract or hiring of grazing to reduce fire hazard. It should be pointed out that this is an area of range management which may be incompatible with ranch management and may have a serious adverse affect on a regular permittee. It also indicates that forage might be available for the use of livestock which have been removed from some given area. Uncommitted forage to be used on such an intermittent basis is rare or non-existent. The discussion on fencing specification near the bottom of the page indicates that fencing can be adapted to minimize interference with movement of wild animals, but this is sufficiently hard to visualize that an example should be given.

Page IV-5

68-80 Item 9 under "Water Developments" mentions the use of submersible or low profile pumps but fails to take into account the energy cost or right-a-way requirements for utilization of such equipment.

Page IV-8

68-81 Item 1 under "Animal-Insect Control" says that control will be conducted under strict federal supervision. This is a policy decision which reflects the Administrations desire to shift predator control from federal to state level. The current law requires, however, that the federal government conduct the program and we should not allow this impact statement to weaken that position. Predator and rodent control should be conducted by federal officials and not only supervised by them.

The second item indicates that control will be prohibited in recreation sites or other areas of concentrated public use. Some of these sites may need such control for health and safety reasons.

On the next page, Item 5, indicates the use of poisonous substances with secondary poisoning characteristics will be prohibited but leaves unmentioned the use of the M-44 which utilizes sodium cyanide and the use of which we oppose.

Page VIII-2

68-82 [The first paragraph indicates that there have been "documented" expressions of interest for alternatives B and C. Where is the documentation?

Page VIII-5

68-83 [The last paragraph states that livestock do not attain full growth on over-grazed range but there is no citation or documentation.

Page VIII-8

The paragraph numbered 14 mentions potential closing of access routes to public lands but that is certainly not the necessary result of Alternative A.

Page VIII-16

68-84 [The page should contain an item number 20 which would state that other economics, tourism, etc. would decline.

Page VIII-17

68-85 [The first paragraph gives an indication of an increase in livestock income associated with maximum grazing but fails to subtract the public cost of such a program.

Sincerely,



Larry E. Moss
Associate Conservation Director

Key No.

- 68-1 Benefits to recreation, wildlife habitat and other multiple use values will be accomplished through the AMP to the extent that these multiple use values can be enhanced by a particular grazing system.
- 68-2 The extent that deteriorated range conditions can be reversed is dependent upon the available resources to correct the deficiencies. However, responses to intensive land management will not be reflected favorably over a few short years. Most western ranges respond to corrective management at a slow rate. The important thing is that the declining condition of the range be halted and reversed.
- 68-3 The BLM participates in, and funds research programs related to range management on a continuing basis. Sagebrush eradication, juniper-pinon eradication, soil ripping, etc., are supportive measures that are carried out in conjunction with the management practices if such supportive measures are deemed desirable or necessary. Refer to page I-3 of the EIS.
- 68-4 True, there are many other options for improving overgrazed ranges. Several alternative management actions and supportive measures are listed in the EIS. The most important option, proper grazing management, is the essence of the entire EIS.
- 68-5 See item 7, page IX-10 of the EIS.
- 68-6 No change proposed. Table I-1 of the EIS lists supportive measures needed for optimum development of the AMP program. Effects of roads and trails are discussed in Parts III, IV and V.
- 68-7 The ratio of AUM's to acres is so varied depending upon the biome and range condition in a particular geographic area that such a comparison would be meaningless.
- 68-8 The word "need" itself can be relative. The protein needs (as well as their source) may be different between individuals, e.g., professional athletes and the elderly. The word is used in this statement in a customary sense of effective demand (demand varies with price). The principal allocative mechanism for red meat in the U.S. is the market. Therefore need and demand for red meat are synonymous as long as demand exceeds biological thresholds for life support.

Key No.

- 68-9 A specific multiple use management goal does not necessarily have to be quantifiable. However, achievement of a specific management goal, for example, wildlife habitat, may be directly quantified in terms of big game harvests in a particular hunting unit.
- 68-10 While there may be instances of some operators opposing the AMP program, official resolutions by livestock user groups are emphatically in favor of the AMP program. See also revised text, pages I-10 and I-11 of the EIS.
- 68-11 An "adequate level" of livestock grazing management does mean that other multiple use values are not adversely affected. An adequate level of livestock grazing management means taking management action and developing supportive measures that are necessary to achieve identified resource management goals in each specific allotment.
- It is unknown at this time how much of the 20 million acres will require exclusion of livestock. These excluded areas may include such things as frail soils, rare and endangered species habitat, high value aquatic habitat, etc.
- 68-12 The criteria listed will be reviewed in terms of limitations as each allotment management plan is developed and implemented.
- 68-13 See item 4, page IX-7 of the EIS.
- 68-14 See Table II-A-2 of the EIS for range condition data by state.
- 68-15 The breakdown of present funds for supportive measures in each AMP would depend upon the particular needs of the allotment. Primary expenditures would be directed at water developments and fencing. Additional supportive measures would be implemented to the extent that management alone could not bring about the desired results within a reasonable time period.
- 68-16 Since the statement deals exclusively with the impacts of livestock grazing and their importance in improving forage conditions under proper management, wildlife forage conditions were not included. This might be more appropriate in a document dealing with impacts of wildlife on vegetation. Much of the woodland-bushland biome with a good variety of understory species is certainly good habitat for deer and many other animals. There are opportunities in all biomes to use controlled burning as a means of vegetative manipulation. Probably the greatest opportunities exist in the woodland-bushland biome.

Key No.

- 68-17 The range improvement portion of the grazing fee is shown on page I-13 of the EIS. The private forage value index of 13 cents reflects inflationary increases.
- 68-18 See page I-13 of the EIS. The rangeland carrying capacity or available forage is not solely committed to livestock use. The text is revised to clarify this point.
- 68-19 Tables I-6 and I-7 show that by 1977 total receipts from grazing fees will exceed the cost of the program. This will continue beyond 1977. By the year 2000 total receipts are projected at 32.2 million versus the cost of the program at 25.9 million dollars.
- 68-20 The data requested are not available. Historical records usually refer to "vast herds of buffalo" or "wildlife was plentiful."
- 68-21 For clarification, removal of livestock would not be considered an irreversible action. On the other hand, a seeding project or dam construction would be considered an irreversible action.
- 68-22 Generally the "demand" is in excess of the forage available for livestock grazing. However, there are some allotments where available forage for livestock grazing exceeds the "demand."
- 68-23 No change proposed. This paragraph deals with a summary of the desert biome. Page II-43 of the EIS deals with climate in the biome specifically and does give temperature ranges.
- 68-24 Text revised. See page II-5 of the EIS.
- 68-25 See revision on page II-7 of the EIS. It is well established that rangelands have been grazed by wild herbivores for, perhaps, hundreds of years, but the intensity of that grazing is unknown.
- 68-26 No change proposed. This is a general statement and readers are advised where they can get additional information.
- 68-27 The discussion referred to was improperly placed in the introductory material for each biome. See Appendices II-E, F and G of the EIS.
- 68-28 The text has been modified to be somewhat more definitive on coal shipments, see page II-19 of the EIS. The statement about relative sulfur content is considered correct and sufficient for the purposes of the impact statement on grazing.

Key No.

- 68-29 The increase in cattle numbers in many of the western states is largely due to the conversion from sheep to cattle operations.
- 68-30 Average earnings per employee are low, probably because of the structure of the regional economy. A relatively high proportion of the work force is engaged in agriculture (9 percent as compared to the western average of 4 percent) and very few are engaged in the manufacturing sector (5 percent compared to 19 percent) where higher earnings are usually found. This explanation, in less specific terms, is contained in the EIS on page II-31.
- 68-31 A more detailed analysis of the economics and environmental problems related to coal would not enhance the EIS. An EIS is currently being prepared on coal leasing on Federal lands.
- 68-32 Text revised. See page II-34 of the EIS.
- 68-33 Text revised. This statement may be questionable and because a resolution of the factual situation would require considerable research and add little to the EIS, it has been withdrawn.
- 68-34 Text revised. See page II-43 of the EIS.
- 68-35 Text revised. See page II-49 of the EIS.
- 68-36 The EIS cannot serve as documentary reference on all life forms known to occur on the national resource lands.
- 68-37 Text revised. The sentence is deleted.
- 68-38 Usually more livestock are placed by some livestock operators on the annual ranges on national resource lands when annual production is substantially increased by very favorable precipitation. This may include some Indians who lease national resource lands and who have the financial resources to increase their herd.
- 68-39 Text revised. See page II-51 of the EIS. As stated in the text, in 1971 there were an estimated 17,000 wild horses and 10,000 wild burros inhabiting areas of the national resource lands in the western United States. More recent inventories indicate there are approximately 27,000 wild horses and 14,000 wild burros. The extent of competition in some areas is such that either the wild horse and burro populations, wildlife numbers or domestic livestock will have to be reduced to prevent deterioration of the rangeland.

Key No.

- 68-40 Surface soil temperatures which are unprotected by vegetative materials often reach temperatures extreme enough to stop or nearly stop soil microorganism activity.
- 68-41 Text revised. See page II-52 of the EIS.
- 68-42 Statement by respondent is true. The impacts described in the EIS are based on present available data, principles established by more thorough studies in other biomes and the experience and knowledge of the writers of the EIS.
- 68-43 Water is not the only factor. The classification of soils as irrigable or nonirrigable only refers to their probable capability, and does not infer that all items soil, climate, economics, etc., are favorable for conversion into irrigated farms.
- 68-44 Irrigated agriculture may be one of the major consumptive users, however, the "use of water" in the cited reference is in the context of recreation in the biome which is essentially nonconsumptive of water. See page II-54 of the EIS for agricultural use of water.
- 68-45 No change proposed. Present day social changes impact traditional modes of living.
- 68-46 Annual average runoff variations within the biome are indicated. In general, there are many more intermittent streams than perennial streams. Within the biome, however, the water quality data used have been collected from perennial streams.
- 68-47 One action probably responsible for woodland expansion into adjacent communities is fire suppression. An important land use change affecting expansion may have been increased livestock use in the latter part of the 19th century and the early 20th century. Another could have involved farming practices on adjacent lands which influenced hydrologic characteristics in the woodland community.
- 68-48 Hurley, New Mexico has been added among those communities affected by mining. No analysis has been made concerning land types affected by mining, since Section II is a description of the environment of the several biomes where grazing on Federal lands occurs.
- 68-49 True, man's fire management has influenced the characteristic of this biome as well as others. However, natural fires still occur despite man's efforts and where these occur, the statement in the EIS is correct.

Key No.

- 68-50 The EIS statement is true as worded. Grazing, as well as many other uses of importance were not listed in the interests of brevity.
- 68-51 The fact that grazing is frequently concentrated along streams and river bottoms is discussed in Part II of the EIS.
- 68-52 Information is not readily available to document withdrawals from grazing in the coniferous forest biome for watershed protection, nor the reductions in livestock numbers as a result of such withdrawals. It has been relatively minor compared to the total land area and number of livestock. Additional withdrawals may be necessary to protect existing water sources.
- 68-53 True, livestock grazing can also pulverize the soil and make the soil more subject to wind and water erosion. This would occur on very localized areas and depends primarily on a high concentration of livestock in close confinement for extended periods of time, the nature of the soil and soil moisture content.
- Pathogens from animal waste are foreign to the soil biota. Text revised. See page III-1 of the EIS.
- Statement has been revised to incorporate comments by respondent concerning duration of flow and periods of dryness. See page III-2 of the EIS.
- 68-54 It is agreed that precipitation must not exceed the infiltration capacity of the soil or gullying or rill erosion will occur.
- 68-55 Agree with comment. This fact is acknowledged in the second paragraph on page III-6 of the EIS.
- It is probably true that new water development may cause animal concentrations which in turn causes soil disturbance and may at times result in accelerated erosion.
- 68-56 This statement may possibly be true in rare instances where the same stream meanders through every pasture of a multi-pasture system. Ordinarily a stream course will traverse through just a corner of one pasture or through two pastures at most.
- 68-57 The additional demands for water by livestock will to a large extent be supplied by wells or earthen reservoirs. It may in fact necessitate piping of water away from small streams to mitigate the livestock concentrations and their effect on fecal and total coliform or other bacteria in the water.

Key No.

- 68-58 Agree with comment; however, in those instances mentioned, artificial sediment barriers may have to be used if it is necessary that the right-of-way be cleared.
- 68-59 The calculation of water requirement was based on a 10-gallon per animal unit day requirement, and proportional to the increase in animal unit days. In many cases livestock are using only a small portion of the capacity of existing water developments, therefore, the increase in water needs may not require new water developments.
- 68-60 The statement indicates that the greater probability of drought occurs in the south temperate grasslands and the hot desert. The relative recovery rates of pastures used in rotation in the different biomes would depend on many factors including weather, degree of utilization by all animals, relative vigor of the vegetation and whether wildlife or wild horses and burros utilized the area after livestock were removed. The amount of forage utilization permitted is important but the amount of rest to permit vigor recovery, production of seeds and reproduction is probably more important.
- 68-61 Removal of livestock "may" be beneficial because wildlife, insects and wild horses and burros may occupy the area and consume the vegetation. Removal of livestock "will" be beneficial if they are the only animals present.
- 68-62 Text revised. See page III-21 of the EIS.
- 68-63 Statement supported by references 25, 26 and 27, page III-48 of the EIS.
- 68-64 Text revised. See page III-28 of the EIS. In the context of this paragraph, a "balanced ecosystem" refers to maintaining big game populations compatible with their food supply. It is true that development of additional water for any purpose is beneficial to wildlife. However, the theme of this EIS relates to water development in connection with livestock grazing management.
- 68-65 Text revised. See page III-29 of the EIS.
- 68-66 There are areas inaccessible to livestock grazing that can be made accessible only by development of roads or trails.
- 68-67 A discussion on control of wild horses and burros is outside the scope of the livestock grazing EIS. Also see response to comment 45-28.

Key No.

- 68-68 The comment reflects the fact that wild horses and burros have few natural enemies. This is not the case with domestic livestock, particularly sheep.
- 68-69 As indicated in Appendix III-A, covering economic methodology, income earnings measures are in constant 1970 dollars; adjustments for inflation are unnecessary, since all other figures would have to be equally adjusted. With reference to private debt, high rates of inflation work to the advantage of the debtor. A debt is contracted at a fixed dollar amount and interest rate. Under inflationary conditions, income and operating costs increase, but the debt does not; therefore the debt is paid off with "cheaper" money than was borrowed. With reference to outside banking effects, the market for loanable funds acts to equate the rate of return on investment (adjusted for risk) between productive processes and geographic areas. The impacts of personal income received by ranchers will have their principal effects in local areas.
- 68-70 Text clarified. See page III-35 of the EIS.
- 68-71 See item 9, page IX-12 of the EIS.
- 68-72 Whether the change is for the better or worse depends on one's viewpoint. In the hot desert biome, it may make the areas much more conducive to soil microorganisms and result in better soil tilth under the thistles, etc. On the other hand, in the cold desert this change in moisture and temperature may shorten the time of soil organism activity so that it could be considered as adverse.
- 68-73 Each BLM project proposal is required to have an environmental analysis record completed to determine if the project will have a significant environmental impact before they are accomplished.
- 68-74 Pressure remains but not to the same degree; thus the statement is correct in that pressure is relieved.
- 68-75 Text revised. See page III-42 of the EIS.
- 68-76 The land on one side was plowed and seeded to crested wheatgrass; the other side was not treated.
- 68-77 Text revised. See page IV-1 of the EIS. The text refers to supportive measures applied in conjunction with management actions. The last sentence of the paragraph emphasizes that these measures will not be applied with undue regard for the environment.

Key No.

- 68-78 The respondent is correct. See response to comment 45-68. The amount of "rest" permitted is perhaps more important than the amount of utilization.
- 68-79 Text revised. See page IV-2 of the EIS. "Excess" refers to years of above average forage production.
- Short term leases and contract or hiring of grazing animals to reduce potentially flammable vegetation on areas where cattle are removed could not seriously affect a regular permittee since he does not hold a permit to graze the area (cattle are removed because of incompatibility with other resources and resource uses).
- Livestock removed from some other area might be used, as suggested by respondent, to utilize this vegetation and reduce the fire hazard, depending on the distance moved. More likely, adjacent ranch operators, or those in close proximity to the area, would be more than willing to harvest the foliage.
- Such instances may be rare or non-existent now but could become more numerous as the management program progresses. Fencing specifications might include lay-down panels, fewer wires, raise the bottom wire so animals can crawl under and lowering the top wire to make the fence easier to jump.
- 68-80 Text changed. Item 9, page IV-5 of the draft EIS has been deleted.
- 68-81 The reviewer's statement is not entirely correct since some control methods such as trapping and shooting, are not required to be carried out by Federal personnel under current law or policies.
- 68-82 On the Alternative B, no grazing, refer to comments by the Arizona Habitat Association, Key No. 38, and the Friends of Animals, Key No. 48.

In addition the Public Land Law Review Commission report of June 1970 (page 116) endorses the dominant use concept for grazing on those lands identified as being chiefly valuable for domestic livestock grazing. The dominant use concept envisions maximization of livestock grazing. In addition to the above references it is not unusual for the Bureau of Land Management to receive letters endorsing the concepts of "no grazing to preserve the environment" and "maximization of livestock production to feed the hungry world."

Key No.

- 68-83 It is fairly common knowledge that if an animal does not receive adequate food, it will not grow and develop fully. It is believed no citation is necessary.
- 68-84 Text revised. See item 20, page VIII-11 of the EIS.
- 68-85 Text revised. See item 20, page VIII-11 of the EIS.

EXTENSION SERVICE
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(503) 623-8171 Dallas
(503) 363-2353 Salem
(503) 838-0580 Independence

May 31, 1974

Mr. Curtis Berklund
Director
Bureau of Land Management
Washington, D. C.

Dear Mr. Berklund:

I am writing to endorse the draft environmental statement on Livestock Grazing on National Resource Lands. I would hope that the Council on Environmental Quality will see fit to accept the statement as is. It is positive in nature and, I believe, fairly presents the thesis that proper grazing by domestic livestock is not detrimental to rangeland condition and in fact, often results in the most efficient, effective and economic means of restoring and then maintaining high range condition.

69-1

The single point that I might raise would be the real contribution of the 13 million AUM's of forage now allocated to livestock on NRL as regards the potential impact on the nation's red meat and fiber supply if any substantial livestock reductions were to be made e.g. alternative B. Economic assessments were made and these most definitely would be real impacts. It would also be helpful to know the numbers of calves and lambs that could not be grazed, thus not be available for the nation's food supply should livestock grazing not be permitted. Perhaps this information could be gleaned from the data going into Table 1-2.

69-2

I would hope that the case for good grazing management could be made even more strongly at the present time since the cost and availability of non-range forage foodstuffs has become much more restrictive.

Sincerely yours,

A handwritten signature in cursive script, reading "T. E. Bedell".

T. E. Bedell
Society for Range Management
Pacific Northwest Section
Public Affairs Committee

cc. Dr. Ben Roche, Dept. Forestry & Range Management
Washington State University, Pullman



Agriculture, Home Economics, 4-H Youth, Forestry, Community Development, and Marine Advisory Programs
Oregon State University, United States Department of Agriculture, and Polk County cooperating

Society for Range Management
Pacific Northwest Section

Key No. 69

Key No.

- 69-1 Based on 1970 data for the 11 Western States, livestock sales per AUM were .076 for cattle and .353 for sheep. Applying these ratios to AUM's from the NRL indicates that the equivalent of 776,500 cattle and calves and 944,500 sheep and lambs would be removed from the market annually under Alternative B or would have to be supplied from higher cost feed sources. Of these figures, 34 percent are calves and 87 percent are lambs.
- 69-2 The use of 1974 cost relationships may not be a good indicator of future production cost relationships. While it is true that 1974 nonrange forage costs have increased faster than range forage costs, the future input costs of supplying additional range forage (e.g., fencing material) has not been evaluated. This type of evaluation is beyond the scope of this document and is best done on specific AMP's or groups of AMP's where specific inputs and outputs are better known.

July 15, 1974

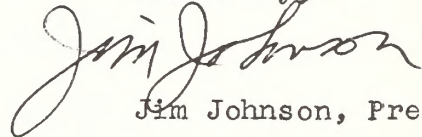
Director, Bureau of Land Management
Department of the Interior
Washington, D.C., 20240

Dear Sir:

Enclosed is a copy of the comments of the South
Dakota Public Lands Council in regards to the Draft
Environmental Statement on Livestock Grazing on National
Resource Lands.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Johnson".

Jim Johnson, Pres.

S.D. Pub. Lands C.

enclosure
JJ/jj

SOU DAKOTA PUBLIC LANDS COUNC

Comments On

Draft Environmental Impact Statement
Livestock Grazing on National Resource Lands

The recently released impact statement on livestock grazing on public lands includes many provisions and policies affecting the future of the livestock grazing industry in South Dakota and the nation, with dangerous implications for many users. Some 10 million acres will apparently be withdrawn from livestock use. Yet there has been inadequate consideration given to the improvements which were implemented following the Taylor Grazing Act of 1934. Damaging over-generalizations, misinterpreted or incorrect information, and biased material has been presented to back up the idea that the rangeland under present management has continued to decline in quality and in productivity. This is simply not true under fair analysis. No recognition was given to improvements on private lands which have enhanced the value of nearby public lands.

The consideration of financial impact was very shallow, dealing only with the direct dollar loss of reduction of AUM's, with no mention of the number of times every dollar circulates within a community and its spiralling value to the welfare of the residents of local towns and cities. No loss value was indicated on animals under six months of age, which constitute the principal selling commodity of a breeder's operation. The impact of loss of public grazing rights on the management potential of privately owned land was ignored. Many small operations may be forced out of business, which would have far greater loss than the AUM reduction would indicate. This would impose added burdens on an already glutted job market

in metropolitan areas, and a subsequent increase in all related socio-economic problems.

Allotment management plans are quite costly, requiring thousands of man hours behind mountains of paper work. A real effort to cooperate with present rancher tenants, making use of their experience and energies, and knowledge of local areas, may be one sensible alternative. In many cases, an allotment plan may not be necessary if the BLM would make resources for improvement available to responsible permittees. A good livestock manager may achieve desired results without using the latest "textbook" or "scientifically proven" methods. There is no substitute for good judgement, and it should be recognized and utilized when possible.

The general tone of the impact statement is prejudicial, in that the policy seems to be the granting of range improvement funds exclusively to those who have signed management plans.

70-5 [The feasibility of allotment management plans would be questionable on South Dakota allotments due to the land ownership pattern and the small acreage tracts of public lands.

A serious deficiency of the impact statement is the lack of input from the livestock grazing industry. Some consultation and exchange of ideas may result in policies more palatable and pleasing to both interests. Livestock producers have been and still are some of our greatest conservationists.

70-6 [What about wildlife? How responsive can the BLM be to the annual changes in numbers and range of state-controlled animals? How will this affect the permittee and his ability to utilize the grass harvest he has purchased in advance? Where is the

70-6 | evidence to support the implication that grazing is responsible
(cont.) | for endangered wildlife species?

In view of the fact that the final impact statement will be subjected to public scrutiny, every effort should be made to assure a balanced, fair and comprehensive picture of livestock grazing on public lands. This should include the importance of the livestock industry economically, the vital role of red meat in a protein-hungry world, and the hazards as well as benefits of dictated management plans. Improperly presented, the impact statement could become a tool of those whose ultimate goal is the complete elimination of grazing of livestock on virtually all public lands.

Key No.

- 70-1 See item 7, page IX-10 of the EIS.
- 70-2 See item 2, page IX-6 of the EIS.
- 70-3 This comment is responded to in item 5a, b and c, pages IX-7, 8 and 9. The physical product contributed to the livestock industry by grazing on the NRL is an AUM; evaluating it in terms of other AUM's is a standard economic procedure. Personal income levels (derived from livestock production) associated with levels of AUM use was selected as a basic measure because it best described economic impact on people and the population as a whole. Multiplier effects were included because they estimate the impact on personal income in sectors of the economy other than livestock production.
- 70-4 See response to comment 37-6. Impacts of loss of public grazing leases and permits are discussed in Part VIII, Alternative B.
- 70-5 The feasibility of developing and implementing allotment management plans would be in line with the criteria stated on page I-9 of the EIS.
- 70-6 See response to comment 62-6. Cooperative agreements between BLM and State wildlife agencies provide the opportunity for flexible management. Wildlife habitat requirements are provided for in the proposed program of livestock grazing management. No inference was intended that livestock grazing is responsible for endangered wildlife species.

Tooele County Cattlemen
&
CowBelle Association
Vernon, Utah 84080

Director, Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Dear Sir:

Pertaining to the draft environmental impact statement for livestock grazing on national resource lands:

Taking livestock off the open range will take meat off the table of the nation's people.

We, the Tooele County Cattlemen & CowBelle Association are heartily opposed to reduction in our grazing permits.. The open range (NRL) is basic to our livelihood. Livestock men plan management of the natural resources to prevent exploitation, destruction or neglect. They advocate conservation and consequently have been able to furnish the nation a plentiful supply of meat.

Livestock men built the West. They wrote it's history. Through the years they have cooperated with government departments (BLM & FS) to conserve and improve the ranges. As a result of this cooperation, they have been able to meet the demands of the growing population for more meat; not by depleting ranges but by improving them.

In today's complex world, cattlemen are faced with many adversities: price ceilings, meat boycotts, fluctuating cattle prices, adverse weather conditions causing death loss, high machinery costs, high interest rates, increased grazing fees, etc. Add to this-widespread vandalism with cattle shot, troughs destroyed, fences cut and gates left open allowing cattle to drift off their ranges.

The trend must be reversed of adversities outweighing incentives if we are to keep our youth in the business. The future of the industry depends on them.

If, in the future, we have to rely on meat imports, we face a repeat of the fuel crisis magnified many times.

Do we have FOOD or FAMINE? The choice is no longer ours.

Calvin E. Olson Pres. Tooele County Cattlemen
Marjorie Ekker Pres. County Cow-Belles



Utah environment center

1247 Wilmington Avenue - Salt Lake City, Utah 84106 - (801) 467-0433

June 14, 1974

United States Department of the Interior

Bureau of Land Management

Utah State Office

PO Box 11505

Salt Lake City, Utah 84111

Dear Sirs:

Below are our comments on the Draft Environmental Impact Statement
RE: Grazing Management on National Resource Lands:

- 72-1 Section II - pg. 15: could you list these particularly "unique ecological and historical sites" which occur on NRL?
 - 72-2 Section II - pg. 36: fourth line from bottom; You probably mean sculpins, not "skulking".
 - 72-3 Section II - pg 68, line 11: somewhere in the impact statement could you specify whether any of these fish are known to occur in lands directly subjected to the Grazing Management Program?
 - 72-4 Section III - pg. 15, last line: It would be more informative if you could give a figure for the increase in amount of evaptranspiration as a result of the numerous small reservoirs.
 - 72-5 Section III - pg. 38: we would appreciate a citation for the last paragraph.
 - 72-6 Section III - pg. 40; lines 4-5: Are "excessive numbers" of game animals a serious problem in much of the impacted area? In areas where numbers are below carrying capacity, a species may be adversely impacted by greater hunting pressure due to increased access. Improved access may also increase poaching losses.
 - 72-7 Section III - pg. 39, first paragraph: Some quantitative indication would be helpful for the following: 1) the frequency of secondary poisoning and the species most often affected, and 2) the seriousness of the problem of rodents girdling wildlife browse plants.
- Section III - pg. 39, last line: Mechanical and chemical manipulation will ultimately improve the habitat of only some species. The optimal habitat of others (for instance, the pinyon jay) may be adversely impacted.
- Section III - Wildlife section: This section seems somewhat subtly biased towards game wildlife. Certain non-game wildlife, such as the prairie dog, may create "problems" to ranchers wanting to graze their cattle without risking losses due to cattle stepping in prairie dog holes and breaking a leg. Do you have a plan for resolving this conflict?

(continued)

Of particular esthetic interest is the welfare of the burrowing owl, an important and possibly declining (though not, of this point, endangered) raptor, and a significant element in the control of rodents in the desert ecosystem. There is some evidence that this ground-nesting owl may tend to avoid areas frequently disturbed by cattle. The same may be true of other ground-nesting species, such as the common Nighthawk, roadrunner, western meadowlark, and various sparrows. In perhaps most cases, they will merely be displaced to adjacent habitat, but if adjacent habitat for these species is unsuitable, significant losses may occur. These losses may be mitigated by surveying the birdlife annually and rotating the grazing such that wildlife (at least the burrowing owl) and cattle do not occur simultaneously on the same range. In addition, we recommend that no chemical or mechanical management programs be undertaken in areas with active breeding pairs of burrowing owls.

72-8 Section III - pg. 44, line 16: In the statement, "... will also affect the management of wild horses and burrows", what does "management" of these animals imply?

72-9 Section III - pg. 44, line 17-20: From a socio-political view point, what plans, if any, does BLM have to mitigate conflicts between ranchers who see wild horses as competition for their cattle and certain citizens who value more highly the esthetics of wild horses?

72-10 Section III - Water Quality Impacts: We think this section should be more detailed. Specifically: 1) What about the potential of contamination of potable drinking water by livestock? This has become a major problem to hikers in parts of the Uinta Primitive Area of Utah. In other areas livestock grazing and subsequent contamination of streams and reservoirs may raise the water treatment costs. Additionally, livestock wastes may add critical amounts of phosphate and nitrate to streams, thus causing unsightly algal blooms. We suggest this be more carefully discussed. 2) pg. III-11, first paragraph: You mention that the "water pollution potential from animal wastes in grazing pastures and grasslands should be minimal under good range management practices," Could you quantify the term "minimal" and explain how you, or EPA reached that conclusion? Also, even if this is true for "grazing pastures and grasslands", would it also hold true of poorly-drained soils, steep-sloped watersheds, and/or alpine grasslands? If so, Why? 3) pg. III-15, line 13: Could you specify what you mean by "such impacts (of animal wastes on water quality) ...are of short duration"? While, after a short time, animal wastes may cease to exert a significant dissolved oxygen demand, it is probable that their nutrient effects will persist for several months after livestock have departed, since these wastes will likely cause algal blooms which will "blanket" the stream substrate, rendering it unsuitable for most fish-food organisms for several months, and which will release the tied-up nutrients, cause odors and exert an oxygen demand as they die off months later. Thus the effects of temporary fertilization may be quite extended. The magnitude of nutrient effects will depend on the time of year the additions are made to the water body, spring and summer being most critical.

(continued)

- 72-11 Section IV - 6, point 4: How long will revegetation take? In some areas with particularly dry climate and poor soils, it may take quite awhile, and we suggest that these areas be allowed longer time periods between rotations. You correctly note the reseeding hazard for some Utah soils in Appendix II-D-12 (kenilworth soils), but we think you should also discuss this in the impact section.
- 72-12 Section III - pg. 14; last paragraph: This seems to contradict the adverse impact you predict may occur in lines 14-15, pg. III-56. While the chemicals themselves may act for only a short time, their impact may be prolonged, as it may take the stream fauna at least 30 days to recover to its previous condition.
- 72-13 Section V - pg. 2 "Vegetation": As an unavoidable adverse impact, we suggest you include the loss of habitat for some species which will result from removing vegetation to construct access roads.
- 72-14 Section VIII - pg. 9, point 5: Why would "some threatened wildlife specieshave an improved opportunity for survival" when animal control practices are stopped, if the situation is really as you assert on pg. IV-9 (point 7) where you say control would be prohibited "unless the control measures are of no danger to the threatened species"? Would or would not threatened species be adversely impacted by the program as presently planned?
- 72-15 Section VIII - point 7: We suggest you also include this impact in the earlier section on "wildlife impacts".
- 72-16 Section VIII - (Alternatives): We recommend you discuss several "mini-alternatives" such as:
- 1) prohibiting grazing on particularly susceptible areas such as riparian woodlands, areas above timberline, and areas with poor soils, steep slopes, and adverse reseeding conditions.
 - 2) prohibiting grazing in areas in and adjacent to localities of high public use of great esthetic interest.

Thank you for allowing us to submit these comments.

Sincerely,

Utah Environment Center

Paul R. Adamus

Paul R. Adamus, Contributing Biologist
PRA/jj

Key No.

- 72-1 No change proposed. This is a general statement. Readers are advised where additional information can be acquired.
- 72-2 Typographical error corrected.
- 72-3 The Owens pupfish and Woundfin minnow occur in streams or impoundments on or adjacent to lands subject to the program. Protective measures have been implemented to assure the survival of these species.
- 72-4 Evaporation rates are given in footnote ^{d/} of Table III-3, page III-12 of the EIS. There is no way to determine the transpiration rates since these reservoirs may hold water continuously or they may contain water only during short periods of time following an overland flow event. If the latter is true, there may be no plant growth to transpire while if they hold water continuously plant growth may become established and transpire.
- 72-5 Text revised. See page III-28 of the EIS.
- 72-6 Text revised. See page III-29 of the EIS.
- 72-7 Quantitative data on secondary poisoning may most readily be obtained through the Fish and Wildlife Service. Girdling of browse plants is known to occur; however, measure of seriousness is not known.
- 72-8 Management of these animals will attempt to preserve the free-roaming nature of wild horses and burros within a realistic ecological balance. It is unrealistic to attempt management of livestock grazing if there is to be no management of the wild horses and burros inhabiting the same area.
- 72-9 In the process of the BLM planning system conflicting interests will be considered. See pages I-21 through I-23 of the EIS for a description of the planning system process.
- 72-10 The question on possible contamination of potable water would be dependent on the stream characteristics and the densities of animals involved. In slow moving small streams or stagnant pools adjacent to heavy animal concentration areas contamination may result. Under good range management conditions there will probably be a reduction in overland flow events and in the size of peak flows. That is, it would take a more intense hydrologic event or a longer duration of the event to produce the same quantity of overland flow entering the stream which in turn will minimize the impact.

Key No.

- 72-10 (cont.) Generally bacterial counts and coliform counts rise with the beginning of a runoff crest. However dilution, temperature and velocity of the water result in a decline in counts which indicates a short duration of the rise in count. In stagnant or nonmoving water the observation on nutrient effects may be correct. In moving streams, water normally does not become oxygen deficient and algae blooms are not normally a problem.
- 72-11 It would be impossible to say how long revegetation will take. This may well be a function of climate for any given time period. Concern over hazards to rehabilitation of some soils would be analyzed within the environmental analysis record required for each project of the Bureau.
- 72-12 No contradiction is seen between the two statements. One says direct overflights are detectable for only a short distance downstream and then for only a short period of time.
- 72-13 Text revised. See page V-2 of the EIS.
- 72-14 Text revised. See page IV-6 of the EIS.
- 72-15 Duplication in other sections not necessary.
- 72-16 The present grazing program provides for the recommendations made by the reviewer.

DAN E. A. POOLE

President

L. R. JAHN

Vice-President

IRA N. GABRIELSON

Board Chairman

HARRY L. HAMPTON, Jr.

Treasurer

WILDLIFE MANAGEMENT INSTITUTE

Dedicated to Wildlife Restoration

709 WIRE BUILDING, 1000 VERMONT AVENUE, WASHINGTON, D. C. 20005 (202) 347-1774

Key No. 73

June 7, 1974

Mr. Curtis J. Berklund, Director
Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Dear Mr. Berklund:

The Wildlife Management Institute is pleased to comment on the Draft Environmental Impact Statement - LIVE-STOCK GRAZING MANAGEMENT ON NATIONAL RESOURCE LANDS, March 1974.

We appreciate the effort that goes into preparation of a document of this scope. It covers the problems connected with grazing management in the various environments in a generally satisfactory manner.

73-1 However, we do have serious questions about the impacts of grazing on wildlife. We have great concern regarding some views expressed in this draft statement, and in some things that have been left unsaid. The most serious deficiency in the report is its basic wildlife assumption that good livestock and range management will of itself improve wildlife habitat. That is not so, even though it is expressed many places in the statement (for example, pages III-30 and VI-7).

73-2 If any action in grazing and range management does improve wildlife habitat, it will usually improve it for only one class or species of wildlife and create detrimental effects on other wildlife. Wildlife habitat requirements are so diverse that all consideration of the effects of vegetative change must be on a species basis. Trade-off considerations between species are needed to assess the impacts of all actions.

73-3 The state wildlife departments only recently have started management and fact finding on nonhunted wildlife. The BLM hardly at all. Some research would have been a great aid in preparing this statement. We call BLM's attention to work being done by the Cooperative Wildlife Research Unit at Oregon State University on forest nongame wildlife, and urge BLM to finance similar studies applicable to National Resource Lands. Very little is known about the needs of wildlife, particularly nongame wildlife, and the effects of the vegetative changes allotment management already is bringing about. The BLM has a mandate to encourage and finance intensive research to remedy this.

73-4

The impact statement does not address itself to the



73-4 (cont.) fact that habitat conditions for some important game species, such as deer, were often created by vegetative changes induced by overgrazing. As range conditions improve and approach climax, the shrub winter ranges may lose productivity and deer will decline. The Forest Service now is using heavy livestock grazing as a wildlife habitat manipulation tool, even to the point of paying for this grazing. BLM recognizes this as a potential for reducing fire hazard on page IV-3 (second paragraph). Why not recognize it as a wildlife management tool?

73-5 Controlled burning is barely mentioned as a management tool, yet there are vast areas where it can be used for improving both livestock range and wildlife habitat. We have seen areas, generally of intermingled ownership, where excellent results have been obtained by prescribed burns.

73-6 The impact statement indicates intense interest and concern with a few thousand wild horses and burros. They receive almost as much space in the statement as the millions of big game, small game, and nongame animals. Wildlife has always been under-funded and under-considered in management of public lands. We caution against overreaction to purely emotional pressures about a relatively few animals to the detriment of the many. We are not against proper management and maintenance of wild horses and burros; rather we are for management of wildlife and believe wild horses and burros should be considered as wildlife in the perspective of the total wildlife resource.

Recreational access to the public lands is a continuing and increasing problem. Public access plans, consistent with long-term wildlife and recreation plans, should be a part of all grazing plans.

73-7 Nowhere in the many discussions of wildlife and water developments does BLM discuss the need for wildlife-escape devices from troughs and tanks. They should be designed into each development.

73-8 The word "pastures" is used frequently. Those unfamiliar with the western scene tend to think of lush dairy farm pastures rather than fenced plots on arid rangelands. A definition of pasture should appear early in the report, as it is basic to livestock control.

73-9 Nowhere in the report did we find mention of Chukar partridge, the most important game bird on National Resource Lands.

Most of BLM's discussions and examples in the desert biome are related to the hot desert. Yet most of the wildlife, livestock and vegetation are produced on the cold desert.

73-10 All of these plans, developments, and mitigation must have regulations to make them work. This statement does not

mention the desperate need for BLM law enforcement authority, and the intensive enforcement effort needed to protect every element of the plan.

73-11

Livestock animals are mentioned as esthetic members of the western scene only once. They are part of the western scene, and management plans should be designed to take advantage of their esthetics. A pasture with cows and young calves is attractive to most people. (page III-62)

In general, we feel wildlife has been considered only in generalizations when the problems and effects are much more specific. It is indicative of the relative importance of the wildlife resource as indicated by the Bureau budget and program. Wildlife is a tag-along; we object to that as we always have. Balanced use and recognition are the needs - and there is still a very long way to go in achieving this for fish and wildlife in BLM's program.

Our comments on specific sections of the impact statement follow by page number.

73-12

page I-1, last line. Multiple use is still not legal on National Resource Lands pending passage of the necessary legislation. This statement should be so qualified.

73-13

page I-3, last paragraph. Mention is made of removal of livestock for wildlife purposes; here BLM should add that heavy or excessive grazing may also be needed as another tool for wildlife management.

73-14

page I-4, paragraph 4, line 4. Change would to could; these techniques rarely result in optimum wildlife benefits.

73-15

page I-9, last paragraph. The statement pays relatively little attention to management of 7 million acres of Section 15 lands. Any management program should protect the land, not just the public interest. Public interest is a general term meaning different things to different people at different times.

73-16

page I-12, last paragraph. What will be the average AMP cost per acre or per AUM? This figure would put the program in better perspective than \$30,000 for each plan.

73-17

page I-15, paragraph 3. The fact that watersheds are improved does not necessarily mean wildlife habitat is also improved.

73-18

page I-19, line 3. Under early natural ecosystems, deer were not present in large herds; see the journals of early explorers.

73-19

page I-20, first line. For accuracy and understanding, name the species deliberately decimated.

- 73-20 | page I-27, 2nd paragraph. Does this discussion of emergency action apply only to livestock habitat, or does it include wildlife habitat emergencies as well?
- 73-21 | page II-1, first line. Livestock grazing also can affect subsurface environment through compaction, erosion, and pulling plants out by the roots.
- 73-22 | page II-7, paragraph 4. Expand second sentence to indicate that this overgrazing, as described, may also be a useful wildlife habitat management technique.
- 73-23 | page II-8, paragraph 2. This discussion applies to both wild and domestic animals. It would be clearer if that were stated.
- 73-24 | page II-16, paragraph 1. Many unique ecological areas have not yet been located or classified. The examples used here are too restrictive.
- 73-25 | page II-34, last paragraph. This, like most following sections on wildlife, makes no mention of the many small perching birds using the many biomes. The examples used are generally restricted to game and predators, with little said about nongame wildlife.
- 73-26 | page II-35, last paragraph. Explain dependency of moose on this habitat.
- 73-27 | page II-45, paragraph 4. Statement should point out that an increase in poisonous plants is nearly always coupled with a decrease in palatable species, and this decrease is also responsible for use of the poisonous plant by livestock.
- 73-28 | page II-57, paragraph 3. Define hardpan and explain its relation to moisture and plants.
- 73-29 | page II-65, paragraph 2. Considerable amounts of grass also are present in western portions of the cold desert - example, Oregon.
- 73-30 | page II-68. Amphibians, such as the recently discovered Desert Slender Salamander should be listed under Threatened Wildlife.
- 73-31 | page II-113, paragraph II. We assume "smaller mountain beaver" to mean Aplodontia rufa. If so, BLM should explain that this is not the common beaver; most people do not know Aplodontia.
- 73-32 | page II-114, Threatened Wildlife. The Columbia white-tailed deer is not a resident of National Resource Lands. The Columbia white-tail lives on flood plain, cottonwood tree lands of the lower

Columbia River. It also is doubtful that grizzly bears are found on the non-Alaska National Resource Lands covered by the statement.

73-33 | page II-119, paragraph 3. We believe that the montane forest presents "extreme safety hazards" to the novice sportsman only in restricted areas. A nonexistent danger is implied.

73-34 | page III-10, paragraph 2. Grazing systems only can partially restore streambank vegetation. Only fencing or elimination of grazing can completely restore bank vegetation, particularly shrubs.

73-35 | page III-11, last paragraph. Change several historically known springs to many.

73-36 | page III-13, paragraph 2. BLM implies that management alone can change deep rooted woody species. We have seen dramatic results in sagebrush areas where native grasses under management substantially reduce sagebrush. If BLM has a different definition of brush, it would help to explain and give species examples.

73-37 | page III-27, last paragraph. Fire does not usually eliminate woody species, it reduces them.

73-38 | page III-29, paragraph 3. Define sheep campsites. Is BLM referring to bedgrounds, shearing stations, or what? It makes a difference.

73-39 | page III-30, Wildlife. See our opening remarks. Improvement of the vegetative resource does not necessarily or always provide more food and cover for wildlife.

73-40 | page III-30. Changing the class of livestock is becoming more and more difficult. Someplace, explain downward trend in sheep numbers and the reasons therefor.

73-41 | page III-33, last of second paragraph. Again, assumption is made that the closer vegetation is to climax the better it is for wildlife--neither a valid nor correct assumption.

73-42 | page III-35, line 2. Add livestock removal from selected portions.

73-43 | page III-35, last paragraph. See opening remarks. Recognition is given that wildfire may improve wildlife habitat. Why not discuss prescribed burning for the same result?

73-44 | page III-36, paragraph 2. All fences restrict antelope movements to some extent, not just woven wire fences affecting winter migrations. See Antelope Workshop, Cheyenne, March, 1974.

73-45 | page III-39, paragraph 2. Access roads can also cause over-harvest of game, induce human congestion, and reduce the quality

of hunting. As a result, shorter seasons and lower bag limits may be necessary.

73-46

page III-52, paragraph 5. The example (ORV use areas) implies ORV will be confined to certain areas. According to our information, this is not the case. ORV use is general and may be restricted or prohibited in some areas - a vast difference.

73-47

page III-57, paragraph 1. The last sentence is not clear in meaning, and not pertinent the way it is written. What is meant about wildlife and pesticides?

73-48

page IV-2, paragraph 2. Aquatic habitat implies ponds to many people. Stress that it also includes streams. What are high value recreation sites? Give definition and example.

page IV-3, paragraph 2. Contract grazing for fire control should also be a technique of wildlife habitat management. See our opening remarks.

page IV-3 - Mitigation of Supportive Measures.

73-49

1. Should define heavy equipment.
2. Construction of fences on wildlife migration routes should be prohibited, not just avoided.
4. Fences should be minimum standard for the class of livestock concerned.
7. Lay-down fence panels should be required for wildlife as well as snowmobiles.

page IV-4 - Water Developments.

73-50

1. Where possible, water developments should be out of sight of main roads.
3. Reseeding should be with a mixture of native vegetative species on construction areas.
4. Native species should be those native to the general area.
7. All waters developed will be provided with escape-ment devices for small birds and mammals.
8. In general, stock watering troughs should be constructed away from reservoirs and tanks where possible.

page IV-5 - Roads and Trails.

73-51

1. Spell out techniques such as water bars, slope, etc., for road drainage.
3. Native planting species should be from the local area.
4. When no longer needed, roads and trails should be closed and rehabilitated.

page IV-6 - Vegetative Manipulation.

73-52

3. This section should apply to all parts of a scenic area - not just the middle and foreground.
5. Siltation reduction should be added to reasons for a buffer strip.
7. Untreated areas should be in strips through and areas and islands within treated areas. Regulations must spell out maximum size of treated areas. The aim should be a diversity of habitat types and a maximum of edge for wildlife mitigation and enhancement.
9. Streams should be added to water bodies in areas protected from chemicals.
16. Vegetative debris from mechanical treatment has value as bird cover. This should be recognized.
19. Trees retained should be scattered in a natural and pleasing manner.

page IV-9 - Animal Insect Control.

73-53

3. Add publication in a local newspaper to placement of warning signs.
6. Animal control should be undertaken only with written authorization of the state wildlife agency.

page V-1 - Water.

2. If seedings fail they must be repeated.

page V-4 - Ecological Relationships.

73-54

4. Although increased vegetation can cause more fires, the type of vegetation can also reduce fires. Fire is much worse in annual cheatgrass than in native bunchgrass which may be much denser.

June 7, 1974

page VI-1, paragraph 3.

73-55

"The major objective of the livestock grazing management program is to maintain and improve vegetative resources through management actions and supportive measures." It does not follow that this necessarily makes a more productive wildlife habitat. That is determined by species, time and place of the vegetative change. Habitat improvement for one species may well be habitat destruction for another.

73-56

In conclusion, this impact statement demonstrates a great knowledge of livestock habitat requirements and techniques of improving that habitat. It demonstrates a great deficiency in knowledge of wildlife habitat requirements, and a great lack of knowledge of the techniques of improving wildlife habitat.

If we have ever seen a mandate for wildlife habitat research - this document is one. We will be pleased to support your requests for monies to undertake this immense task and to assist in other ways in broadening BLM's fish and wildlife habitat management program.

This statement has been coordinated with William B. Morse, the Institute's western field representative.

Sincerely,



Daniel A. Poole
President

DAP:bsm

Key No.

73-1 Text revised. See page III-22 of the EIS.

Improvement of the vegetative resource as a result of and within the constraints of the proposed action will usually improve wildlife habitat. AMP's properly developed will reduce the occurrence of mismanagement. Additional explanations are provided in response to comments 25-8 and 25-23. See also item 11, page IX-12 of the EIS.

73-2 It is believed that proper grazing management, based on the physiological requirements of the vegetation and the ecological potential of the range site, will improve habitat for more than one class or species of wildlife. This has proven to be true in many of BLM's existing AMP's where a variety of wildlife are found within the allotment. True, vegetative changes resulting from livestock management actions may be beneficial to one or more species of resident wildlife and may be detrimental to others or at least result in "no change" for certain species. Objectives for managing the ecosystem for the benefit of wildlife are recognized in the planning system and the AMP. Necessary trade-offs are recognized early in the planning process. For example, if deer and a threatened wildlife species are found in the same allotment, the decision may be to manage livestock grazing to protect or enhance the habitat for the threatened species. Deer habitat may not be changed or may suffer as a result. But the choice is made through the planning system processes.

73-3 BLM and other state and Federal land management agencies have an urgent need for research results to guide resource management decisions. Since BLM is not a research agency, it must depend on others for research data applicable to public land management. BLM does identify research needs and communicates these needs to research organizations. BLM does provide funds, although relatively minor amounts, to other agencies and institutions to undertake cooperative research on mutual problems. BLM will continue to seek research assistance where knowledge is deficient, not only in non-game wildlife, but in many other areas as well.

73-4 Page III-22 has been revised to indicate that intentional overgrazing by domestic livestock can be implemented as a management action to benefit wildlife species such as deer.

73-5 The use of fire for improvement of wildlife habitat is recognized. See page III-21 of the EIS.

Key No.

- 73-5 (cont.) Controlled burning is recognized as a management tool. This subject will be covered in detail under the programmatic environmental impact statement of fire management, presently under preparation by the Bureau of Land Management.
- 73-6 What appears to be emotional pressure by some may not be considered so by others. BLM will take into consideration the demands for all legitimate uses in the administration of the national resource lands.
- 73-7 Text revised. See item 6, page IV-3 of the EIS.
- 73-8 A definition of pasture as used in the statement is added to the glossary, page G-5 of the EIS.
- 73-9 Text revised. See page II-49 of the EIS.
- 73-10 The scope of this environmental impact statement cannot appropriately deal with the subject of law enforcement.
- 73-11 Comment is not inconsistent with the text. See page III-42 of the EIS.
- 73-12 Although the BLM Organic Act would provide the BLM with a mandate in law for management, the multiple use management concept has been practiced on national resource lands for many years under the broad authority of the Secretary of the Interior and this concept of management will continue to be exercised.
- 73-13 Text revised. See page I-2 of the EIS. Heavy or excessive grazing is a management action that can be taken by increasing the intensity of use.
- 73-14 Text revised. See page I-3 of the EIS.
- 73-15 It must be emphasized that the 7 million acres of isolated tracts referred to in the text are not all section 15 lands. Some section 15 lands are very important from the multiple use concept. The Bureau's planning system process would identify those isolated tracts which would require more than custodial management.
- 73-16 Based on present information the average AMP development cost per acre would be approximately \$1.75 in Federal funds. An additional operation and maintenance cost of 11¢ per acre annually would be required.

Key No.

- 73-17 Proper implementation of the program under existing restraints (management framework plans) and procedure should yield improved wildlife habitat as well as improved watersheds.
- 73-18 Text revised. See page I-17 of the EIS.
- 73-19 Text clarified. See page I-17 of the EIS.
- 73-20 This discussion relates to action necessary to halt resource deterioration caused by livestock grazing. Wildlife habitat could be directly affected by the necessary action.
- 73-21 Text revised. See page II-1 of the EIS.
- 73-22 The discussion referred to by the reviewer (see page II-5 of the EIS), is quoted from James A. Lewis. Page III-22 of the EIS explains that livestock overgrazing can be an effective wildlife management habitat improvement technique.
- 73-23 The discussion, quoted from Lewis (see 73-22 above), does not restrict itself to either domestic or wild animals.
- 73-24 The examples of unique ecological areas used in the EIS are for illustrative purposes to provide reviewers with some idea of what was meant. To provide additional listing of examples of these areas would not substantially improve the EIS.
- 73-25 An attempt has been made throughout the text to identify significant impacts on all wildlife which may occur as a result of the program action. Commonly the most evident conflict occurs with wildlife which coincidentally are game animals. An inference may be drawn that nongame wildlife were not considered. The inference is not intended.
- 73-26 Sentence deleted.
- 73-27 Text revised. See page II-34 of the EIS.
- 73-28 Hardpan--a hardened soil layer, in the Lower A or in the B horizon, is caused by cementation of soil particles with organic matter or with materials such as silica, sesquioxides or calcium carbonate. The hardness does not change appreciably with changes in moisture content and pieces of the hard layer do not slake in water. It is a restrictive layer to both root penetration and water percolation.
- 73-29 Text revised. See page II-49 of the EIS.

Key No.

- 73-30 Text revised. See page II-50 of the EIS.
- 73-31 Smaller mountain beaver does refer to Aplodontia, not the common Castor.
- 73-32 The statement in the text refers to the coniferous forest biome and is not restricted to NRL.
- 73-33 Text revised. See page II-87 of the EIS.
- 73-34 Text revised. See page III-7 of the EIS.
See also response to comment 25-19.
- 73-35 Text revised. See page III-10 of the EIS.
- 73-36 Paragraph referred to was based on closed pinon-juniper stands and closed mesquite stands.
- 73-37 Text revised. See page III-21 of the EIS.
- 73-38 Text revised. See page III-21 of the EIS.
- 73-39 See item 11, page IX-12 of the EIS.
- 73-40 Text revised. See page II-51 of the EIS.
- 73-41 Text revised. See page III-22 of the EIS.
No assumption is intended.
- 73-42 Text revised. See page III-26 of the EIS.
- 73-43 See response to comment 73-2 above.
- 73-44 Text revised. See page III-26 of the EIS.
- 73-45 Text revised. See page III-29 of the EIS.
- 73-46 The statement does not imply that ORV use will be confined to certain areas. It does say, "The increase of livestock numbers on certain areas may have an adverse impact on recreation land uses." At this time it would be impossible to predict what action would be necessary to manage the potential conflict.
- 73-47 Text revised. See page III-39 of the EIS.

Key No.

- 73-48 Text revised. See page IV-1 of the EIS.
- 73-49 Text revised. See page IV-2 of the EIS.
- 73-50 Text revised. See page IV-3 of the EIS.
- 73-51 Text revised. See page IV-4 of the EIS.

The passage concerning road and trail standards has been rewritten, but space does not permit a recitation of specifications for the many types of roads and trails which may be built under greatly varying conditions of climate and physical conditions.

- 73-52 Text revised. See page IV-4 of the EIS.
- 73-53 Coordination of animal control programs with state wildlife agencies results from compliance with item 4, page IV-6 of the EIS. Publication of control programs may be appropriate in some cases.
- 73-54 Text revised. See page V-3 of the EIS.
- 73-55 Text revised. See page VI-1 of the EIS. Also see item 11, page IX-12 of the EIS.
- 73-56 See item 9, page IX-12 of the EIS. The EIS is not a wildlife management environmental impact statement, but evaluates the grazing management program as it relates to impacts on wildlife and other public land values.

The Wilderness Society ♦ — ~~799 FIFTEENTH STREET, N.W., WASHINGTON, D.C. 20005~~ — ♦
 1901 Pennsylvania Ave., N.W., Washington, D.C. 20006

July 12, 1974

Director
 Bureau of Land Management
 U. S. Department of the Interior
 Washington, D.C. 20240

Dear Sir:

The Wilderness Society appreciates the opportunity to comment further on The Draft Environmental Impact Statement (DEIS) on Livestock Grazing on Public Lands which was afforded by the recent extension of time for receipt of comments on this important matter.

The following comments augment our previous comments which were submitted by our Western Field Office, Denver, Colorado under date of June 13, 1974.

In our opinion, the draft environmental impact statement makes several assumptions which we feel are misleading or false. These are:

- 74-1
1. That 140 million acres of public lands are suitable for livestock grazing, will be grazed and Allotment Management Plans will be developed for these 140 million acres;
 2. That livestock and wildlife numbers will be increased on the public lands; and
 3. That land use patterns in the West are static.

We feel that the above assumptions are not valid for the following reasons:

1. There is increasing demand for the use of public lands for purposes of water and energy development;
2. Demographic projections show that expanding urban areas of the West doubtless will require more energy, water, transportation systems, city expansion areas, recreation areas and other accouterments of expanding cities; and
3. Urban expansion will affect the numbers of livestock and wildlife on public lands adversely. Roads, fences, power lines, pipelines, etc. with the attendant increases in human activity that each produces, places stress on all life forms utilizing public lands.

The statement, in general, is full of inaccuracies and contradictory statements. Several of the statements do not agree with information contained in the document Public Land Statistics - 1971 (PLS), published by the Bureau of Land Management.

The following are examples of some of the inaccuracies noted:

- 74-2 1. The statement notes on page I-4 that 140 million acres are suitable for livestock grazing. The overview to Biomes (pages II-2 to II-7) notes that about 149 million acres are usable for grazing. This is inconsistent.
- 74-3 2. We note a discrepancy of 2 million AUM's between Table I-2, page I-6 and Table 60, page 92 of the PLS. The EIS overstates the AUM's.
- 74-4 3. Concerning the numbers of livestock utilizing public lands, there is disagreement between the EIS and PLS. The EIS states that there are approximately 3.2 million more animals on public lands than is noted in PLS.
- 74-5 4. The terminology and completeness of information concerning endangered species is deficient throughout the EIS. The term "threatened" is used in large part. The information should be correctly stated and consistent with the "Endangered Species Act of 1973".
- 74-6 5. In comparing Table I-7, page I-18 and Table III-3, page III-17, concerning numbers of animals using public lands, and their annual consumption of water, we note that approximately 13 million livestock utilize about 14,000 acre feet of water annually while about 2 million wildlife use over 433,000 acre feet annually. It is inconceivable that such a great variation in
- 74-7 water requirements exists. There is also a discrepancy in the numbers of wildlife using public lands as noted in Table I-7, page I-18 and PLS Table 58, page 88.
- 74-8 6. In Chapter III - Environmental Impacts - under the sections covering Humans and Human Interest Values, the major thrust is toward the livestock operator and recreation users respectively. This is a very narrow base and does not consider the sightseer, vacationer, retail merchant or others interested in public lands. Similarly, the human interest values must consider the impacts of grazing on primitive areas, wildlife, unique areas, watersheds and other resource values.
- 74-9 7. In the discussion of biomes in Chapter II it is noted that about 21.6 million acres (13%) of land are in a declining trend. We assume that this is in relation to the grazing program. BLM's annual wildlife report for 1972 notes the following percentages of wildlife habitat as unsatisfactory:

Big-game habitat	-	43%
Small-game habitat	-	21%
Waterfowl habitat	-	14%

These figures average to 26%, or twice the unsatisfactory

Page 3.

BLM

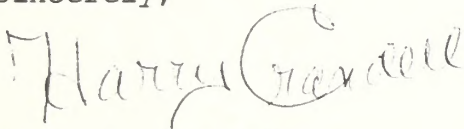
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74-9 (cont.) condition as noted in the grazing program. There is plainly a need to coordinate statements within the EIS with other documents issued by the Bureau of Land Management.

74-10 The Livestock Grazing Management on National Resource Lands statement is generally and specifically inadequate, contradictory, and incomplete. The assumptions presented lead to erroneous conclusions, such as the amount of meat that can be produced in the future. Much of the data is old and of questionable validity, i.e. the 1964 Range Condition Classification. The statement appears to be self serving to the livestock industry with minimum value given to other resource values of the public lands and the benefits they yield to the American public.

We recommend that this statement be re-written as a multiple-use document that recognizes all resources of our public lands and not a maximization of grazing.

Sincerely,



Harry B. Crandell
Director of Wilderness Reviews

Key No.

- 74-1 The present estimate of 140 million acres of national resource lands available for livestock grazing is based on data available at this time. As resource inventories are refined the acreage available for grazing may be revised either upward or downward. Also, through the Bureau of Land Management's land use planning system, decisions regarding areas of use for livestock grazing will also be made. If the scientific knowledge that is available cannot be applied with the result of increasing livestock and wildlife numbers on the public lands then there would be no reason to attempt management of these public lands. The text does not imply that land use patterns in the West are static. See pages I-21 through I-23 of the EIS.
- 74-2 "Usable" for grazing is not the same as "suitable" for livestock grazing. See page G-7 of the EIS.
- 74-3 Table 60 of the Public Land Statistics does not include those grazing lands located outside the grazing district boundaries (commonly referred to as section 15 lands) that are grazed under a lease rather than by a license or permit.
- 74-4 See response 74-3 above.
- 74-5 Text revised. See pages II-28, II-50, II-69 and II-84 of the EIS.
- 74-6 Table III-3 has been relabeled and footnoted to clarify the data. The 433,000 acre-foot water requirement includes water for waterfowl marshlands, lake surfaces and stream flows for fisheries and was previously labeled as consumptive use incorrectly.
- 74-7 Table I-8 of the EIS refers to animal-unit-months, not numbers of animals as shown in PLS.
- 74-8 No change proposed. The major impacts on people occur on recreation users and livestock operators. Other users are affected also as noted by the reviewer, but are less in degree. The items mentioned by the reviewer are discussed in the EIS. Sightseer and vacationer are all part of the "recreationist." Impacts on wildlife, unique areas, etc., are also discussed in the EIS.
- 74-9 The 1964 range condition data is the latest data available for the national resource land related to the livestock grazing program. This data will be updated in fiscal year 1975. BLM is initiating integrated study procedures that will accomplish more consistent data reporting.
- 74-10 See item 9, page IX-12 of the EIS. The comment goes beyond the scope of the livestock grazing EIS.

June 13, 1974

RECEIVED
BUREAU OF LAND MANAGEMENT
COMMUNICATIONS UNIT

JUN 17 1974

AM 7,8,9,10 11,12,1,2,3,4,5,6 PM

Director
Bureau of Land Management
U. S. Department of the Interior
Washington, D. C. 20240

Dear Sir:

The Western Regional Office of The Wilderness Society welcomes the opportunity to comment on the far-reaching grazing management program of the Bureau of Land Management.

We find the Bureau's Draft Environmental Impact Statement regarding the Live-stock Grazing Management on National Resource Lands a good beginning. However, it is inadequate in two major ways. First, specifics for 150 million widely varied acres cannot possibly be dealt with in one universal statement. Secondly, as a generalized overview of the BLM's grazing program, the DEIS lacks general comments showing the range of impacts in the four biomes, which is needed to form a comprehensive framework serving as a guide for more detailed local statements.

75-1

With regard to the first inadequacy, The Wilderness Society believes this DEIS is so broad that the real impacts on the land and the specific trade-offs that will be made cannot be addressed. We recommend individual impact statements for each planning unit, exploring in detail the proposed allotment management plans and grazing systems in that planning unit. The need for an impact statement at the local planning unit, or planning system level, is shown by the following statement on page I-2: "The planning system identifies the compatibility of livestock grazing with the other resource uses and the extent to which livestock grazing will take place in a geographic area. The actions necessary to achieve this desired management of livestock grazing are documented in an AMP which utilizes an interdisciplinary approach." This is the level where the specific physical, biological, social, and development impacts could be best anticipated, studied, and followed. It is the level where the actual decisions are made.

75-2

With regard to the second inadequacy, the generalized, over-all statement should contain the assumptions behind the proposed action. In other words, what are the problems or needs which cause the proposed action to be considered, and what are the alternatives for solving those problems or meeting the needs? The statement should also delineate the qualitative and quantitative aspects of the full range of impacts of the proposed action in the full range of environments involved. Finally, this statement should provide a framework for more detailed, localized statements. Indeed, we find the above offer the only valid purposes of an over-all statement.

In addition to the two inadequacies outlined above, we find that the present statement emphasizes many possible ways in which the proposed action might be construed as beneficial, while glossing over or neglecting to discuss adverse impacts and relevant subjects. The following are examples of omission:

- 75-3 1. The Wilderness Resource. This resource should be given recognition apart from Ecological Interrelationships, Aesthetics, or Human Interest Values in Parts III, IV, V, VI, and VII. The impacts of the grazing management program on the wilderness resource should be discussed. How will 99,000 miles of proposed fences, 5,500 miles of proposed roads, 4,050 miles of proposed trails, and the proposed chemical and mechanical land treatments affect the wilderness resource? We would stress that grazing and wilderness are compatible uses where developments and vehicular use are kept to a minimum. The lack of roads and developments gives good protection to livestock from rustling, off-highway-vehicle harrassment, and other disturbing influences of civilization.
- 75-4 2. Grazing Systems. A more detailed explanation, in terms easily understood by the public, of what is meant here by a grazing system is needed. How has this form of management come to be developed, what assumptions are made, what areas are lacking knowledge and scientific data? What need does it fill, why does this form of management best solve the present problems, and what other alternate grazing systems exist? The statement on page I-4 "The ecological basis for the application of grazing systems on NRL is supported by the potential that exists for improving range condition" gives no support for the specific actions proposed.
- 75-5 3. Relationship of Subregions and Impacts. After a lengthy discussion of the four biomes in the western United States and their ten subregions, the complexities of these differing environments are not specifically related to the grazing systems. What is the biological basis of and need for, in terms of both range improvement and livestock operations, management practices in the various biome subregions? What are the differing impacts of the livestock grazing management program on the soil, water, air, vegetation, wildlife, livestock, and other resources in each subregion? Which components of the grazing system work best in some regions and not in the others? Any reasonable livestock grazing program must be based on soil conditions. Soil conditions differ from area to area. Statements, such as the one on page I-4, that "Overgrazed ranges will improve more rapidly with proper livestock grazing than with no livestock grazing" need elaboration and documentation for each of the subregions.
- 75-6 4. Delineation of Major Problems on the BLM Administered Grazing Lands. Where are the overgrazed lands, and why does this condition persist? What is the extent and location of the drought areas and the lands that should never have been grazed? What are the mechanisms the BLM can use to cut back grazing on these specific areas? What is the future outlook for these areas? Where are the endangered species located on the grazing lands and where do problems of wildlife mortality and starvation caused by competition with domestic livestock occur? What specific steps does the BLM need to take to comply with the new and greatly strengthened Endangered Species Act? None of these questions is specifically addressed.
- 75-7 5. Energy Calculations. The vital impact of energy use should be discussed. What are the trade-offs in energy gained and energy lost for the individual management practices, including changing season, frequency, or intensity of use, rest and rotation of livestock use, and the supportive measures, including fencing, water development, chemical land treatment, chaining, brush removal, plowing, burning, seeding, road and trail building? Do some practices have greater net efficiency? What are different energy efficiencies of improvements which manipulate livestock, versus those which manipulate the land? How does net energy efficiency of these practices change with environmental factors in the subregions? What is the order of magnitude of fossil fuel use needed to sustain intensive management of the grazing lands and how will the increased cost of all types of energy change the cost to the government and the livestock operator in the future? What other alternatives exist with different levels

of efficiency? The combination of actions that are the most energy-efficient might be presented as an alternative.

75-8 6. Incomplete Discussion. For example, the program's beneficial impacts on wildlife are mentioned often; however, the impacts are not always beneficial. Many species would be disturbed by roads and man's associated use, development, and vegetational changes. On page I-5, if mention is made that roads and trails will serve hunting, fishing, camping, and prospecting, mention should also be made that these same developments can also cause wildlife disturbance, destruction of cover, excessive harvest, increased opportunity for vandalism and rustling, and loss of solitude and wilderness.

7. Mitigating Measures. We question the statement on page IV-1 that "The degree to which any of the measures can be implemented is dependent upon public support and resulting organizational capability in terms of funds and manpower." We strongly believe that mitigating measures should go hand-in-hand with the grazing program if the multiple use concept is going to be followed. Intensive livestock and development programs should not be initiated unless there is existing capability to carry out the mitigating measures needed.

75-9 8. Adverse Impacts. Many of the impacts of allowing no grazing should be restated in Part V, Adverse Impacts Which Cannot Be Avoided. For example, it follows from Part VIII, page 9, that threatened wildlife species may be adversely affected by the grazing program. It follows from page 10 that there will be wildlife mortality due to starvation as an adverse impact. The introduction and establishment of exotic plant species should be listed as an adverse impact.

75-10 9. Short Term Uses Versus Long Term Productivity. One large gap in this section is again the lack of consideration of wilderness values. Possible loss of archeological and historical attributes is recognized, but loss of the wilderness resource through short term intensive grazing use involving development is totally overlooked or ignored.

75-11 10. Irreversible and Irretrievable Commitments of Resources. This part is very inadequate. Irreversible and irretrievable commitment of resources for each of the ecological, historical, geological, archeological, and wilderness values should be thoroughly examined and elaborated upon. Some roads and developments will bring irreversible changes to the land. Fossil fuel use is an irreversible and irretrievable commitment of the finite resource, the exploitation of which may adversely affect livestock grazing, wildlife forage, and water tables.

75-12 11. Alternatives to the Present Program. Great improvement is needed in this section. Alternatives addressing efficient energy use should be explored. There is an alternative between no grazing (B), and the proposed plan.

75-13 12. Definition of "Trail". "Trail" should be defined. Are the 4,050 miles of new trails proposed foot trails, horse trails, stock driveways, or vehicular trails?

75-14 13. Private Investment. We feel the impact on the multiple use concept for the BLM public lands of investment by private livestock operators should be carefully considered before this approach is implemented. Too frequently, private investment on federal lands has given the private user leverage and license to misuse the resources.

In summary, the Western Regional Office of The Wilderness Society finds that the Draft Environmental Impact Statement regarding Livestock Grazing Management on National Resource Lands generalizes and glosses over, in its obsession to promote intensive grazing, many major adverse impacts on the public lands. With the new

directives that will come with the soon-to-be-passed BLM Organic Act, BLM officials will have to demonstrate equal consideration for the various multiple uses according to their appropriate application on the land. Areas of environmental concern will have to be given recognition. It is time that any major BLM plan, such as grazing, give adequate attention to these issues.

Sincerely,

A handwritten signature in cursive script, reading "Clifton R. Merritt". The signature is written in dark ink and is positioned above the typed name and title.

Clifton R. Merritt
Director of Field Services

The Wilderness Society
Western Regional Office

Key No. 75

Key No.

- 75-1 See item 3, page IX-6 of the EIS. Also the EIS is revised to clarify the purpose and scope of the EIS. See page I-1 of the EIS.
- 75-2 The programmatic statement discusses the Bureau's livestock grazing program that has evolved over the 40 years since enactment of the Taylor Grazing Act which established by law, a policy for managing the vacant public land. The statement does address aspects of the full range of impacts to the extent they can be identified or projected. See also response to comment 75-1 above.
- 75-3 The text is revised to present more detailed discussion of the impacts of livestock grazing on wilderness values.
- 75-4 Respondent is asking questions which cover a major portion of the entire field of range management. Grazing system is defined in the Glossary (page G-3). There are an infinite number of "grazing systems" which have been developed over many years as a result of scientific research, field trials and experience.

Many present problems exist because of deficient knowledge in the past about plants and the impacts of plant utilization at different seasons. The Taylor Grazing Act, providing some degree of control and management was passed in 1934. This time frame is relatively brief when compared to the length of time livestock have been grazing on national resource lands. The ecological potential that still exists for improvement (or to prevent further deterioration) is, in fact, the basis for implementing the actions proposed.

- 75-5 Various grazing systems (and other management actions) will be designed and applied within the various biomes and subregions to meet the specific needs of the area. The basis of and need for improved livestock management is the past history of mismanagement in many areas in all biomes resulting from deficiency in knowledge. Impacts of the livestock grazing management program are similar, differing only in degree of magnitude, in all biomes and subregions. Each or all components of the "grazing system" will be applied as needed to accomplish proper management. In addition to soil, the grazing program must also be based on vegetation, hydrology, wildlife and other resource uses and values. The statement quoted by respondent is true for all biomes and subregions where overgrazing has occurred.

See also item 8, page IX-11 of the EIS.

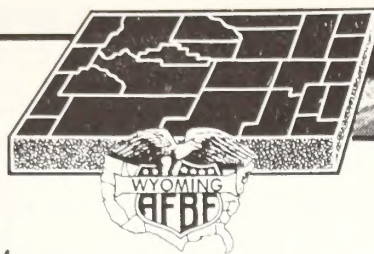
Key No.

- 75-6 Overgrazed lands (as well as managed lands) are found scattered on the BLM administered lands. This condition persists because of inadequate knowledge in the past and inadequate resources to cope with the problem. Drought comes and goes and to attempt to describe the location and extent of drought areas is of questionable value. Lands that should not be grazed will be identified in the Bureau's multiple use planning system. The mechanics "BLM can use to cut back grazing in these specific areas" are described in the EIS as management actions (page I-2). The "future outlook for these areas" is described in Part III--Impacts.
- 75-7 A realistic comparison of energy requirements would be very difficult to make because records of specific requirements have not been kept. Requirements are highly variable between allotments. The suggestions have merit for application in specific proposals such as the development of individual AMP's or an environmental analysis on a specific proposal and will be considered in such evaluations.
- 75-8 Explanation concerning access roads occurs in numerous sections of the text. Adverse impacts of the program and of the alternatives are also discussed.
- 75-9 Part V--Adverse Impacts Which Cannot be Avoided--relate to the management program described in the EIS, not to the "no grazing" alternative which is completely different. Implications drawn by the respondent are erroneous concerning the alternative of no grazing, i.e., that it follows then that threatened wildlife will be adversely affected and wildlife starvation will increase by the management program described in the EIS. Much discussion is, on the contrary, presented in the EIS which described the beneficial impacts of the management program on wildlife. Introduction and establishment of exotic plant species may be a beneficial impact on watershed hydrology, domestic livestock and soil protection. Some exotic species also provide food and cover for wildlife.
- 75-10 Text revised to be responsive to this comment.
- 75-11 Text revised. See page VII-1 of the EIS. It should be emphasized that the subject of the statement pertains to livestock grazing impacts.
- 75-12 See item 10, page IX-12 of the EIS.
- 75-13 Trails may be stock trails for moving livestock and providing access to remote areas which might also serve as foot trails and horse trails.
- 75-14 See item 4, page IX-7 of the EIS.

Wyoming

Key No. 76

State Office
406 So. 21st
Laramie, Wyoming 82070



"Wyoming's Largest Independent Agricultural Organization"

P. O. Box 1348

Phone 745-4835

July 11, 1974

Director (330)
Bureau of Land Management
Department of Interior
Washington, D.C. 20240

Dear Sir:

On behalf of the Wyoming Farm Bureau Federation, I wish to express our members' appreciation for the extension of time to comment on the "Draft Environmental Impact Statement of Livestock Grazing Management on National Resource Lands."

76-1

In my letter, dated June 11, I emphasized that the draft EIS was written with an anti-livestock bias. I suggested that some corrective action be taken to give livestock grazing proper credit for the contributions it makes to other national resource land users. Without such supportive data and proper comments, it would appear the draft EIS is another step to eliminate domestic livestock grazing from these federal lands. I re-emphasize that concern.

76-2

After additional time to scrutinize the draft EIS, I must reiterate that this document, in our opinion, is biased against livestock grazing and toward recreational and wildlife interests. It appears this document may have been prepared to support the preconceived set of ideas that livestock grazing should be subordinate to recreational and wildlife uses. If that is, in fact, the case--this draft EIS is of questionable scientific value.

To substantiate our statement that this draft EIS is written in an anti-livestock bias, the following references are cited with appropriate comments.

76-3

Page I-3, lines 10-12. "Removal of livestock" is recommended "where livestock grazing is not compatible with other resource values or uses." This is biased against livestock!

76-4

Page II-44, paragraph 2. We question the statement that "A large portion remains undeveloped, providing significant recreation." How is "significant" defined? We wonder just what number of persons use this large undeveloped portion for recreation. We wonder if you can verify that statement with statistics and other supportive documents. If so, these should be published as part of the draft EIS. If not, the paragraph should be rewritten to properly reflect the actual amount of recreational use of such lands.

76-5 Page III-9, paragraph 2. We think wildlife, wild horses and burros should be considered simultaneously with livestock grazing if soil compaction is to be considered a factor.

76-6 Page III-10, paragraph 2. Experts state it isn't necessarily true that livestock will invariably destroy vegetation along with supplies (streams and water impoundments). Some factors are uncertain. It would also appear that whatever the adverse impacts of domestic livestock, similar impacts would result from wildlife, wild horses and burros. Extensive recreational use along water courses would also have similar effects as claimed in the draft EIS.

76-7 Page III-15, paragraph 2. The first sentence is very broad and inconclusive. It should be deleted or extensively revised. We also wonder what makes anyone think that wildlife, wild horses and burros don't have similar effects on water as domestic livestock do.

76-8 Page III-29, first three lines. Vegetative manipulations by stockmen is listed as beneficial to the remaining vegetation. We suggest there is a benefit to non-agricultural interests such as to wildlife forage. This should be more clearly stipulated in the draft EIS.

76-9 Page III-35, lines 12-27. In general we concur with the concepts about the grazing of livestock stimulating bud development and tender shoots for wildlife, as well as the danger of non-harvested growth providing fuel for wildfires. We think one or two examples of field experiences should be included to provide additional insight as to the potential loss which would occur as a result of exclusive wildlife ranges. It also might be useful to include range fire examples caused when forage wasn't adequately harvested.

76-10 Page III-38, last paragraph. Our field reports verify that survival of young wildlife has been improved by predator control programs. Range operators who are knowledgeable observers indicate that wildlife losses this past year have been substantial due to lack of an effective predator management program. We suggest inclusion of additional information to support and communicate to hunters and other sportsmen the projected potential impacts outlined in this paragraph.

76-11 Page III-48, in general. Wildlife hunting should also be more favorable and plentiful as more feed and water become available. Thus, proper livestock grazing management programs in most cases contribute to improving wildlife habitat. This benefit should be stressed in addition to those accruing to the livestock operator.

76-12 Page V-4, Ecological Interrelationships #2. "Livestock excreta will be deposited on land being grazed and in accessible waters." That is

listed as an adverse impact which cannot be avoided. Are wildlife, wild horse or burro excreta deposits on national resource lands or in accessible waters, more acceptable and not adverse impacts?

76-12
(cont.) What about the human excreta deposited on national resource lands and in accessible waters? Isn't that an adverse impact? Without intensive administration of recreational uses human wastes are going to indiscriminately be deposited on land and in adjacent water. Germs carried by human excreta are more dangerous than those contained in livestock waste. Shouldn't these factors be considered in the draft EIS?

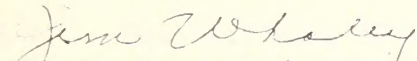
We believe from these examples it is apparent that the draft EIS has an anti-livestock bias.

In our opinion, food and fiber production for human use is, perhaps, the most valuable use of federal land resources. Experts like members of the Council for Agriculture Science and Technology agree with that concept. Thus it seems, the draft EIS subordinates livestock grazing to wildlife and recreation. We object to such priorities!

76-13 In conclusion, we request that the draft EIS undergo a thorough revision to include documentation of the multitude of benefits contributed by livestock grazing. Such an extensive rewrite is necessary to bring a balance between benefits and adverse impacts of livestock grazing, wildlife and recreational uses.

Thank you.

Sincerely,


Jim Whaley, Chairman
Natural Resources Committee
Wyoming Farm Bureau Federation

cc: Vince Horn	Leonard Johnson
Don Baker	Senator Hansen
Jack Hertzler	Senator McGee
Craig Thomas	Representative Roncalio

Key No.

- 76-1 See item 1, page IX-5 of the EIS.
- 76-2 See item 1, page IX-5 of the EIS. Prior to development of the Draft EIS the Bureau consulted with many individuals, groups and organizations in an attempt to avoid subjective input in development of the Draft EIS. Again the Draft EIS was widely circulated for review and comments that could be considered in preparation of the Final EIS. The impacts, as presented, represent objective evaluation of the program.
- 76-3 Text revised. See page I-2 of the EIS.
- 76-4 No change proposed.
- The Bureau has not developed recreation use statistics by biomes--the statement reflects the best judgment of BLM personnel. "Significant," as used by the statement, reflects that the area (biome) is important for recreation.
- 76-5 Wildlife use of an area would certainly contribute to soil compaction similar to livestock use. However, the document is concerned with the impacts of livestock on natural resource lands, not wildlife.
- 76-6 The document is concerned with the impacts of livestock on water, not the impacts of wildlife, wild horses and wild burros. Admittedly, the impacts would be similar.
- 76-7 See responses 76-5 and 76-6 above.
- 76-8 The benefit addressed is the remaining vegetation regardless of what consumer utilizes it; that is wildlife, domestic animals or soil organisms.
- 76-9 The principle of increased lateral bud development resulting from livestock use is explained. Wildlife habitat in areas receiving excessive livestock use can be improved for wildlife through proper livestock management. A more natural and undisturbed habitat could also occur in areas set aside for exclusive wildlife use. The necessity for effective management would remain to hold wildlife populations in balance with available habitat.
- 76-10 Text revised. See page III-28 of the EIS.
- 76-11 Direct economic benefits to the livestock operator from implementation of the proposal are explained. Improved habitat resulting from proper livestock management will aid wildlife reproduction and survival. Where this occurs increased harvestable surpluses of wildlife may be expected and sportsmen would benefit.

Key No.

- 76-12 This document analyzes the environmental impacts of livestock grazing management on natural resource lands. Analyzing the impacts of wildlife, wild horses and burros or humans is beyond the scope of this statement.
- 76-13 An objective evaluation of the impacts of livestock grazing does not seek to "document" benefits of livestock grazing as in industry but only to evaluate the impacts of the program.

WYOMING PUBLIC LAND USERS COORDINATING COMMITTEE

300 N. CENTER

P. O. BOX 115

PHONE 265-5250

CASPER, WYOMING 82601

CO-CHAIRMEN:

BRUCE VONFORELL
PRESIDENT, WYOMING
STOCK GROWERS ASSN.

WILLIAM P MAU
PRESIDENT, WYOMING
WOOL GROWERS ASSN.

July 10, 1974

Director, Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Gentlemen,

Enclosed are two copies of comments on the Draft Environmental Impact Statement, Livestock Grazing Management on National Resource Lands.

These comments were prepared by the Wyoming Public Land Users Coordinating Committee, representing more than 2,900 grazing permittees using NRL grazing lands in Wyoming. The committee consists of representatives of both the cattle and sheep livestock growers in the state.

We request that these comments be made a part of the official record of the Draft Environmental Impact Statement.

Sincerely,

WYOMING PUBLIC LAND USERS COORDINATING COMMITTEE

John P. Burke
John Burke, President
Wyoming Wool Growers Association

Walt Reynolds
Walt Reynolds, President
Wyoming Stock Growers Association

cc: Honorable Gale McGee
U. S. Senator

Wyoming Public Land Users Coordinating Committee
P.O. Box 115
Casper, Wyoming 82601
COMMENTS
Draft Environmental Impact Statement
Livestock Grazing Management on National Resource Lands

The Wyoming Public Land Users Coordinating Committee is making this statement as a representative of the 2,900, and more grazing permittees using the NRL grazing lands in Wyoming under authority granted by the Taylor Grazing Act of 1934, in response to the Draft Environmental Impact Statement published in 1974.

Our comments are in reference to the Taylor Act, which provides for conservation of the public land and stabilization of the livestock industry.

77-1 From the tone of the Impact Statement, no mention is made of the management years, 1934-1964. During these years the program was productive in the increasing of carrying capacity, building up of the AUM's, and fencing. These developments have been implemented under the present AUM-P. program, and over all no decrease in domestic livestock occurred. The statement overlooks the fact that the Taylor Grazing Act was enacted to correct the situation which obtained prior to 1934 and that, under the Act, overgrazing has been substantially controlled and vast areas of rangelands have been substantially improved. In addition, no mention whatsoever is made of the drought conditions of the late 1920's and early 1930's which contributed extensively to the substandard range conditions which existed in many areas.

77-2 The tone of the Impact Statement is set by these misleading statements, which do a disservice to the past efforts of both the Bureau and the livestock industry. It is simply not true, as the quoted statements clearly imply, that the trend for 100 years has been a declining condition with little or nothing being done to reverse that trend until implementation of the present program in 1969.

77-3 These statistics, taken together with those appearing throughout the impact statement which relate only the total number of AUM's on NRL to the total amount of forage consumed in the several biomes would make it appear that the withdrawal of grazing from the NRL would have an insignificant effect, both on area income and on the total meat production.

These statistics ignore such things as the added value of the personal income which would be lost by the elimination of grazing on NRL. Only sporadically and briefly is it explained that there are a number of metropolitan centers in the areas described. There is then, no breakdown which demonstrates separately the economic impact on the rural areas which would occur through the elimination of livestock grazing on NRL as opposed to the impact on the total area, including the urban centers.

The statement does not explain the relation of NRL grazing to individual ranching operations. In many instances, the NRL grazing is vital to the total operation and without it, even though the number of AUM's of grazing on NRL lands may be much less than the AUM's grazed on the permittee's private lands, the ranching unit could not be economically operated without the AUM's of grazing on the NRL. Thus, a total reduction of income from grazing could occur, even though the statistics used would indicate only a partial income reduction from the loss of grazing privileges on NRL lands.

77-4 Table I-4 is a table of estimated forage conditions as the result of the projection of the AMP program to the year 2000. The table gives no information upon which to base a judgment as to any improvement in conditions during any period of time preceding 1964.

77-5 The statement discusses range improvement funds almost solely in terms of prospective commitments. Little or no recognition is given to improvements since enactment of the Taylor Grazing Act and none to those improvements made by the livestock industry.

77-6 Under each of the chapters describing the various biomes there appears a paragraph headed "Threatened Wildlife". There is no explanation for the inclusion of such paragraphs and, since the statement purports to describe generally the environmental impact of grazing on NRL, the mere inclusion of such paragraphs implies that the species listed as threatened are so because of livestock grazing. Unless it is clearly and conclusively demonstrated that the listed species are threatened by domestic livestock grazing, it is inexcusable to make that inference in the impact statement and, if both livestock grazing and other factors contribute to a threat to any species, the nature of the threat from all sources ought to be stated.

77-7 The impact statement is speculative in its quoting the amounts for range improvements, the amount of fee increase after the present formula ends in 1980, in its estimates of operation costs and incomes, while the Taylor Grazing Act already has the improvement funds written in the law. Since the figures used are only estimates of operation costs and incomes, while the Taylor Grazing Act already has the improvement funds written in the law. Since the figures used are only estimates of statistics, the Impact Statement should be revised to (1) give a more complete history of the management of the public rangelands both before and since enactment of the Taylor Grazing Act; (2) demonstrate the improvements which have occurred since

77-7
(cont.)

the Taylor Grazing Act, properly crediting the livestock industry with its contribution to improvements, including the voluntary reduction of herds when conditions required reductions; and (3) generally revise statistics so that they more properly reflect (a) the impact of NRL grazing on local as well as regional economies; and (b) the correct relationship of the NRL contribution to supplies of food and fiber.

77-8

There is no mention of control of wild horses and burros, no control of people usage, no control of wildlife, and no protection of permittees for their AUM's.

The pollution potential ~~is~~ a very hard practice to follow with the majority of the development already being completed. Wildlife increases are at the expense of the livestock permittee.

It fails to mention the benefits of livestock grazing, except in the summary section.

With these few statements of importance to us, we feel the Draft Environmental Impact Statement on Livestock Grazing Management on National Resource Lands is inappropriate for the livestock user, as originally submitted.

We recommend that the comments and recommendations of the "Task Force of the Council for Agricultural Science and Technology" be carefully scrutinized and adopted as presented.

Wyoming Public Land Users Coordinating Committee

Key No. 77

Key No.

- 77-1 See item 2, page IX-6 of the EIS.
- 77-2 See item 2, page IX-6 of the EIS.
- 77-3 The income effects described in the text in dollar amounts would be the effect whether they are in rural or urban areas; only the percentage comparisons to total personal income are affected by inclusion of urban areas. See also response to comment 37-5 and items 5a, b and c, pages IX-7 through 9 of the EIS.
- 77-4 Data preceding 1964 comparable to that in III-A-2 were not available for the national resource lands. In addition, the EIS addresses future range and watershed conditions if the management program is implemented as presented.
- 77-5 See item 2, page IX-6 of the EIS.
- 77-6 Some of the more common wildlife species in each biome have been identified in the text. Those species of wildlife considered on the basis of current knowledge whose continued survival may be in jeopardy as a species have also been identified. No suggestion or inference is provided as to the reason these species are threatened. A deletion of the threatened species from the text would prevent adequate consideration of these species by those who are to judge the proposed grazing management program.
- 77-7 The projection of grazing fees is not intended to be speculative, but is based on experience with the present grazing fee schedule and projected minimal inflationary trends.
- The projection of range improvement funds is consistent with the authority of the Secretary of the Interior in establishing a range improvement fee under Section 3 of the Taylor Grazing Act.
- See also item 2, page IX-6 and item 5, page IX-7 of the EIS.
- 77-8 See item 9, page IX-12 of the EIS.

WALTER J. REYNOLDS, Douglas, *President* • J. KRUEGER, Wheatland, *First Vice President* • C. D. PALM, Elk Mountain, *Second Vice President*WILLIS J. BRUCE, Newcastle, *Second Vice President* • GLEN WADSWORTH, Lonsdale, *Second Vice President*DEAN T. PROSSER, JR., Cheyenne, *Executive Vice President, Brand Inspector* • AGNES B. HAWLEY, Cheyenne, *Association Secretary-Treasurer*

WYOMING STOCK GROWERS ASSOCIATION



113 EAST 20TH STREET • P. O. BOX 206
CHEYENNE, WYOMING 82001

Area 307-638-3942; 638-3277

July 8, 1974

Director (330)
Bureau of Land Management
Department of the Interior
Washington, D. C. 20240

Dear Sir:

The following comments on the Draft Environmental Impact Statement, Livestock Grazing Management on National Resource Lands are rather broad in nature as a detailed comment would be as much as the draft itself.

The back-door selling approach to AMP management may be an effective method. However, it is hard to sell to the users of the NRL who use land for grazing purposes. The increased AUMS to be recognized from the AMP system will benefit the users, as well as the American people. The theory of multiple use is a sound philosophy and a workable one that should be retained. The comments on Alternatives A, B, C and D and E are considered to be important to the grazing industry and the multiple use concept. The livestock producers using NRL recognize the increasing demands on NRL and are, for the most part, ready to do their fair share in improving the long-term productivity of NRL, under sound long range programs.

It is with these thoughts in mind that we submit the following comments for the record and for your consideration.

Sincerely,

P. MILTON HYATT, Chairman
Forest Advisory & Public Lands Committee

Enclosure

WYOMING STOCK GROWERS ASSOCIATION

P. O. BOX 206

Cheyenne, Wyoming

COMMENTS

Draft Environmental Impact Statement

Livestock Grazing Management on National Resource Lands

78-1 The Wyoming Stock Growers Association disapproves of the general historical implications and thrust of this Draft Environmental Impact Statement feeling that those who wrote this Statement were definitely prejudiced in their opinions and poorly versed on the true historical facts about grazing on the public lands of the West. One would gather from the direction of this Statement

78-2 that no improvements in grazing practices on public lands occurred until after the implementation of the AMP program in 1965. The facts will in no way support this contention because many range improvements were put on the lands by the ranchers themselves during the time period of 1935-1965 and many ranges were carrying more livestock in 1965 than in 1935. The Wyoming Stock Growers Association also disapproves the inference that all of the evils of over-grazing were caused by the cattleman and the sheepman, when actually it was the vast herds of buffalo and other wild game that kept the creek bottoms over-grazed for an unknown number of years previous to 1870. Proof of this can be produced by pictures taken in about 1870 which show no trees or willows along any of the major creeks or rivers in the public lands states. There were very few cattle in these areas until after 1870, and practically no sheep. It wasn't until after about 1890 when the pioneer ranchers of the West began to fence the creek and river bottoms and reserve these pastures for winter use that tree

vegetation was able to survive. This was truly the first rest rotation system to be introduced into the West and from it our present river bottom coverage began and habitat for increased wild life was provided. There is absolutely no question that there is more wildlife in the West today than there were in the years previous to 1935.

78-3 [It would appear that the authors of this Impact Statement wrote it for consumption East of the Mississippi River and in large metropolitan areas rather than as a true statement of the historical past. Otherwise why was there so little mention of The Taylor Grazing Act of 1934 -- its purpose, its goals, and the accomplishments that it made to the public lands of the West. One would think also that the authors intended to use this Draft Statement as a promotional "gimmick" to sell the A.M.P. program and thereby justify greater budgets, larger expenditures, and more B.L.M. personnel to carry out the proposed plans.

With this as a rather abrupt introduction to the following comments about the Draft Environmental Statement, the Wyoming Stock Growers Association would like to go on record as being strongly opposed to the general thrust implicated by the Statement and request that the whole approach to the situation be toned down and broadened to allow more alternatives than are suggested here. Specifically we wish to comment on the following portions of the Statement:

1. I - 8 Paragraph 3. The Bureau has failed to learn a lesson here. The already implemented AMP programs should be turned over to the persons holding grazing rights. The BLM should provide technical assistance, as well as initial development aid. Then the area should be managed by the lessee. If the current trend continues the bureaucracy required to manage already implemented plans will nullify any benefits by causing increased costs which will make grazing on NRL uneconomical. Supervision and maintenance should be delegated to the lessee subject to approval of

local Advisory Board; enforcement or surveillance to the BLM.

78-4

2. I - 12 Paragraph 2. 1964 data is not significant in this case. The AMP program was not initiated until 1965. Give the Bureau credit for successfully improving NRL grazing lands. The results of AMP's in several areas have produced applaudable results in the past ten years, and even back until 1935.

3. I - 15 Paragraph 2. This is the correct attitude; sell the AMP program from results already recognized, not by past history of poor performance.

78-5

4. III - 2 thru 9. This section fails to mention the benefits of livestock grazing. This section should be redrawn and coordinated with the summary section which does mention benefits as an after thought. Paragraph 3, page III 9 is important and loses impact by being at the end of the section. We object to the negative approach as written.

5. III - 11. "Pollution potential", "Lack of data" and "appearances" will not hold water. Good management practices will minimize any impact. Water sources on much NRL land in Wyoming are superior to some domestic supplies!

78-6

6. III - 33. As antelope are the predominate wildlife use on NRL lands in Wyoming, and antelope numbers are far in excess of previous levels, and livestock use has not been significantly reduced, and the range is in better shape than the previous decade, then management on NRL and private lands has made the increase in antelope numbers possible. With 200,000 plus head of antelope, there is a valid question if further increases at the expense of livestock grazing can or should be justified.

7. III - 35 Paragraph 2. This point comes in as an after thought. It should be presented as a positive and forceful statement. No apologies should be made for the good that comes from dual use!

8. III - 39-40. This summary is good. It developes a positive attitude towards AMP's and should be used throughout the Draft.

78-7

9. III - 46-47. It is true that the AMP is helping the American people have a greater and better supply of red meat on their table, but the use of such plans is justified on the basis of providing more for wild horses, burros and wild life - the first two having none other than aesthetic value to very few persons. A re-write is in order here.

10. VIII. Alternatives as such should be viable to the American people. Clearly alternatives B and C lack this quality. Neither alternative B or C has a realistic attraction to the majority of people either rural or urban. They, upon being considered in this light, should be omitted and filed as extremist views!

Alternative A does offer the people an advantage. The advantage relates back to the comments on Section I, page 8, paragraph 3.

Alternative A should include as duties technical and initial assistance. Leaving the custodian to manage and maintain under the Bureau's supervision. This would permit Bureau people to continue development of new AMP and relieve them of management and maintenance duties.

Alternative D is also advantageous.

Reviewing Tables I-6 and VIII-1 total cost for the accelerated program in Alternative D while costing more per year, actually reduces projected total cost by 208 million dollars - a substantial sum. Returns from the advanced program would accrue at a faster rate thus improving the overall NRL status, both environmentally and productively.

A 15% reduction in Treasury revenue is being offset by a 10-year advancement in improved conditions, both environmentally and economically, as the grazing industry continues to play an important role in producing

an exportable product that balances our foreign trade deficit!

78-8

11. III - A-5. This section should not have been borrowed. The changing world demand for food may have a very significant influence on the demand for NRL grazing resources by the year 2000. Food resources are a world wide situation and Paragraph 4 should undergo revision and recognition of impending world wide food shortages.

12. III - A-8. This section is of most significance and should be presented as such. Projections indicate the need for increased production of NRL lands. This deserves a better place in the Draft than the last page which many will fail to read.

78-9

In summary we respectfully object to unqualified statements that livestock grazing causes soil compaction, water runoff, erosion, increasing shrub density, and increased water and air pollution without also mentioning the advantages to the environment of properly managed livestock grazing on public lands. Please don't forget that wild life and man himself are polluters of our environment and should be given equal credit along with domestic livestock where these lands are used under the multiple use concept. The Draft Environmental Impact Statement leaves the impression that wild horses and burros should replace domestic animals on the public lands, when in fact the wild horse protection act specifically infers that the population of these animals shall be managed by the agencies at the same level as of the effective date of the Act (December 1971). ~~The~~ entire wild horse and burro section of the Statement tends to make domestic livestock the culprit for all the wrongs cited where in truth the real damaging impact arises from the horses and burros themselves.

It is the opinion of the Wyoming Stock Growers Association that Alternatives A, B or C are in no way acceptable to us or the general public and are

hardly worth the time or printing costs to explain them. Therefore we will suggest complete rejection of these alternatives and would like to recommend a more acceptable alternative (E) which would allow for the continuation of the existing AMP program under the multiple use concept. Thus we would endorse Alternative D and (E) as the two most viable programs for the future use of the Public Lands. With this new alignment we would strongly recommend the adoption of the new (E) Alternative as being the most practical and most saleable alternative that could be carried out without greatly increased budgets or personnel, and still steadily improve the forage production on NRL lands. In our opinion, this alternative could be sold to the public and Congress as the most viable approach to the future management of the Public Lands.

In addition the Wyoming Stock Growers Association would like to endorse the findings of the "Task Force of the Council for Agricultural Science and Technology" with headquarters from the Department of Agronomy, Iowa State University, Ames, Iowa. This review of the subject at hand is thorough, technical, and based on good sound judgment by knowledgeable people in the field of range management.

Sincerely,

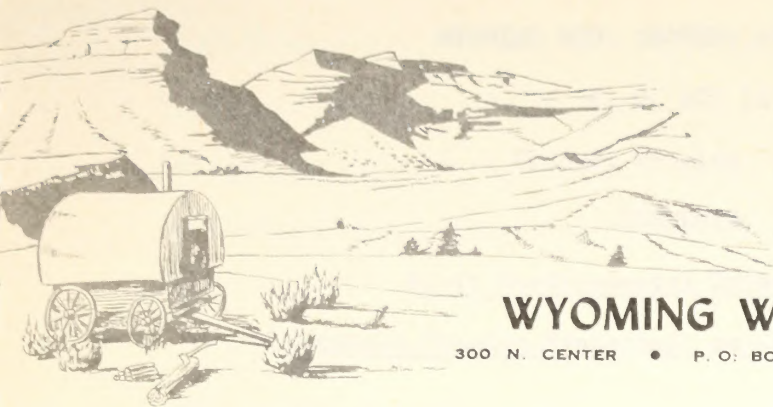
WYOMING STOCK GROWERS ASSOCIATION

Wyoming Stock Growers Association

Key No. 78

Key No.

- 78-1 See item 1, page IX-5 of the EIS.
- 78-2 See item 2, page IX-6 of the EIS.
- 78-3 See item 6, page IX-9 of the EIS.
- 78-4 See item 2, page IX-6 and pages I-10 and I-II of the EIS for discussion of improvements on NRL.
- 78-5 Text revised. The discussion in Part III of the EIS describes the benefits expected from proper livestock grazing management. Some of the sentences have been revised to eliminate negativism inferred by the respondent.
- 78-6 No evidence or suggestion is offered in the text to suggest Wyoming livestock are to be reduced in number for an allowed increase in antelope numbers.
- 78-7 See page I-1 of the EIS for clarification of objectives of the livestock grazing management program. The discussion under Part III, on pages 32-34, relating to impacts on wild horses and burros is for the purpose of showing the reader how the grazing program can be expected to affect those animals.
- 78-8 The referenced section was quoted because the authors of this statement would have said exactly the same thing, including paragraph 4. There is no evidence of a major change in foreign trade policy regarding livestock production at this time.
- 78-9 BLM recognizes the rate of increase of wild horses and burros on national resource land. However, as Table I-8 indicates based on present policy and available data, it is not the intent of the Bureau to increase wild horse and burro populations above the estimated numbers that existed at the time PL 92-195 was enacted in 1971. As data on wild horses and burros are refined and management plans are adopted the problem of increased numbers of wild horses and burros will be confronted.



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WYOMING WOOL GROWERS ASSOCIATION

300 N. CENTER • P. O. BOX 115 • PHONE 265-5250 • CASPER, WYOMING 82601

July 10, 1974

Director, Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Gentlemen,

Enclosed are two copies of comments on the Draft Environmental Impact Statement, Livestock Grazing Management on National Resource Lands.

These comments are submitted on behalf of the Wyoming Wool Growers Association, representing 2,000 sheep and wool producers in Wyoming, and affiliated industries.

We request that these comments be made a part of the official record of the Draft Environmental Impact Statement.

Sincerely,

WYOMING WOOL GROWERS ASSOCIATION

(Mrs) Jessie Baker
Acting Secretary

JB/b1
Enc.

WYOMING WOOL GROWERS ASSOCIATION

P. O. BOX 115

Casper, Wyoming 82601

COMMENTS

Draft Environmental Impact Statement

Livestock Grazing Management on National Resource Lands

These comments are presented on behalf of the Wyoming Wool Growers Association which has served as spokesman for the sheep industry in Wyoming for the past 71 years. Wyoming is the second largest wool and lamb producing state in the nation, for a realized cash income in 1973 of \$21,587,000 worth of sheep and lambs, and \$13,337,000 worth of wool.

We object to alternatives A and B in the Draft Environmental Impact Statement and have set down some of our reasons for these objections. We contend that alternative C, maximize livestock production, is not feasible since it would not conform to the multiple use concept. Alternative D appears to be a justification of increased expenditures by an expanded bureaucracy. Although some Wyoming ranchers have developed workable allotment management plans, other grazing districts may require diversified alternatives.

Reasons for objecting to Alternative A - Custodial Management

Alternative A, the custodial management of national resource lands under the administration of the BLM, would provide minimum retention of personnel to issue grazing permits or leases, collect fees, and complete necessary administrative functions. Since the existing AMP program would appear to be a step backward.

Management according to each individual operator's desire could result in exploitive grazing practices with results similar to those experienced between prior to 1935. Planned grazing management has improved
79-1 | vegetational and soil conditions; however, the EIS almost totally ignores
| improvements made under the Taylor Grazing Act from 1934 to the present.

Nearly 1,300,000 acres of sagebrush have been sprayed in Wyoming by government agencies and individuals through 1970. A typical sagebrush area on the Red Desert of Wyoming showed an increase of production from 100lb./acre of air-dry grass to over 300lb./acre, after spraying. Average annual precipitation in this area is 6-8 inches; therefore moisture is the limiting factor for production.

The above information is recorded in "The Use of and Effects of Pesticides for Rangeland Sagebrush Control" May 1972, a pesticides study of the Environmental Protection Agency, Office of Water Programs. The study also indicates that control of sagebrush, affecting a good balance of browse and herbaceous plants provides succulent forage for wildlife in the critical periods of late winter and early spring.

On Page I-4 the EIS states, "The declining condition of millions of
79-2 | acres of rangelands caused by overgrazing during the past century sets the
| stage for needed improvements.

"Scientific research shows that overgrazing has been so widespread that a lessening of grazing intensity or shortening of season of use commonly leads to appreciable improvement."

The statement clearly implies, contrary to fact, that the same situation prevails today as in 1874, ignoring the fact that the Taylor Grazing Act was enacted to correct overgrazing and other misuses. The EIS does a disservice to the past efforts of both the BLM and the livestock industry, indicating that NRL have continued to deteriorate for the past 100,

years, while in fact, vast areas of rangelands have been substantially improved.

Reasons for objecting to Alternative B - No grazing

Alternative B would prohibit livestock grazing on national resource lands.

The compatibility of multiple use of public lands should be recognized. The Wyoming Wool Growers Association favors the concept of multiple use of public lands and urges the continued development of all resources on public lands.

In P.L. 88-607, Classification of Land for Purpose of Disposal or Interim Management, Act of September 19, 1964, the Secretary of the Interior is directed to administer for multiple use those lands he determines to be suitable for interim management. (Sec.3).

Federal lands comprise 48 percent of the total land area in the contiguous 11 Western states. 87 percent of all Federal lands in these 11 states is administered by the Forest Service or the Bureau of Land Management.

Economic Effects of Alternative B - No grazing

Utilization of Federally owned rangeland to produce meat and wool contributes a significant proportion of the area's economy. In 1970, approximately 12 percent of the necessary forage in terms of animal-unit-months (AUM's) was supplied by grazing on 73 percent of the Federal lands in the 11 Western states.

76.9 million pounds of sheep and lambs, and 14.2 million pounds of wool was produced on Federal lands in the 11 Western states in 1972. Gross receipts of this production was \$23 million. Using a conservative 2.25 multiplier, the production of sheep, lambs and wool contributed \$52 million to the economy of the area.

Gross receipts from 429.2 million pounds of cattle and calves resulted

in \$150 million, or \$338 million contributed to the economy.

Therefore, the elimination of grazing on Federal lands in the 11 Western states would result in an approximate loss of \$173 million of gross receipts from sheep, lambs, wool, cattle and calves. \$390 million would be lost in community revenue, which would greatly hamper state and local economies.

79-3 In Table III-4 on Page III-49, an income multiplier of a little over 1.5 is used which we feel is far too low. The total effect of gross receipts on the economy of a community should be figured with at least a 2.25 multiplier.

Large numbers of ranchers in the 11 Western states are dependent on grazing permits, since private lands of many ranch units cannot supply enough forage for all seasons of the year. Many of these operations would not survive a complete withdrawal of Federal grazing privileges.

79-4 On page II-16, authors of the impact statement suggest that because of the large percentage of ranch owners depending on parttime employment in local communities, it is the community which supports the ranching industry rather than vice versa. This statement is certainly not true in Wyoming, where the livestock industry earned cash receipts of \$306,406,000 in 1973 from the sale of cattle, calves, sheep, lambs and wool.

79-5 On the contrary, the ranching industries have supported many Wyoming communities for generations, and in doing so provide an opportunity for some operators of marginal or sub-marginal part time ranching operations to obtain supplementary income through off-farm employment.

Direct effects of the suspension of all livestock grazing on national resource lands is estimated, on page VIII-11, at \$45 million or four percent of the sector's annual earnings in all Western states. We feel

79-5
(cont.)

this estimate is much too low, that the statistics used are questionable, and that the direct effects would be at least \$10 per AUM, or \$128 million, with the total effect at \$260-300 million, using a 2.25 multiplier.

79-6

The statistics used ignore the added value of personal income that would be lost by the elimination of grazing on NRL. There are a number of metropolitan centers in the areas described, and there is no breakdown separating urban from rural areas, demonstrating the economic impact on rural areas and deeded lands which would occur as a result of the elimination of livestock grazing on NRL.

There is probably no way of estimating the true impact of the elimination of grazing on NRL without examining the effect on the total ranching operation of each individual permittee, including his deeded lands. The statistics used in the EIS estimate only the minimum economic effects of each of the alternatives.

Environmental Effects of Alternative B - No grazing

Planned seasonal grazing and controlled animal distribution foster rapid Vegetational growth. Most grazing experiments show that ranges may be improved more rapidly under proper grazing management than with no grazing management at all.

A report on the economic and environmental impact of Livestock Grazing on Federal Lands in the Eleven Western States was prepared at the request of Representative Steven D. Symms (R. Idaho) and submitted to Congress in January 1974. The report was developed by a task force of leading scientists with expertise in agricultural economics, agronomy, animal science, crop science, forages, range science, and soil science. We quote from the report:

"After giving due weight to natural landscape differences, we find

no evidence to indicate that well-managed grazing of domestic livestock is incompatible with a high quality environment. There is ample evidence that managed grazing by livestock enhances certain uses and that poor management detracts from them. Properly managed grazing is a reasonable and beneficial use of the range."

The report also explores the impact of grazing animals on recreational and aesthetic values:

"The livestock industry is central to the image and traditions of the American West, and a well-managed range with its cattle herd, roundup, or sheep camp presents positive recreational values. At least two studies have shown that cattle and sheep on the landscape are aesthetically pleasing to tourists who come to view the West and its present-day activities. In the end, the extent to which aesthetics would be affected by discontinuation of grazing would depend on the value system of the individual concerned."

79-7 | At various points throughout the impact statement, geological values or geological phenomena, archeological sites, historical sites or historical values, etc. have been mentioned. The national park service has for many years been setting aside as national parks, monuments, and historical sites, most of those areas of significant geological, archeological, or historical value. The write-up of this impact statement would leave the impression that these types of sites are scattered liberally throughout the national resource lands. In fact, they are very rare and for the most part have been protected. Those which are of sufficient value to warrant protection should be protected. The impact of grazing on all others would seem to be of relatively little concern.

79-8 | Unrestrained growth of vegetation would not be aesthetically pleasing and, in fact, ungrazed ranges are subject to raging wildfire. Tall stands

79-8
(cont.)

of mature, ungrazed grasses create extreme fire hazards because fire spreads more rapidly in dry grass than in any other natural vegetation. Ungrazed areas around campgrounds, homesites, and timberstands are especially flammable.

79-9

Suspension of grazing permits for domestic livestock would result in under-utilization. If game herds were allowed to expand to use the forage more completely, it would result in severe oversue of range lands in early spring, and in late fall and winter on winter ranges. There would still probably be underutilization during the stages when forages reach maturity.

79-10

Livestock erect and maintain water reservoirs which benefit both domestic livestock and wildlife. These facilities would be lost if livestock were removed from NRL, or they would have to be maintained by the administering agency, resulting in additional outlay of Federal funds.

79-11

The impact statement states, on page VIII-9, that since animal control practices for protection of livestock would not be required, "predators and some threatened wildlife species would have an improved opportunity for survival." If predator control was not practiced by ranchers in Wyoming, the effect of an uncontrolled population of coyotes and fox would be very detrimental to deer, elk, game birds and other wildlife.

In summary

Four alternatives are considered: (a) custodial management, (b) removal of livestock from natural resource lands, (c) permit livestock grazing for maximum livestock production on natural resource lands, and (d) acceleration of the present program by developing and implementing allotment management plans at an increased rate.

79-12

Why is continuation of the present grazing program not considered as one possible livestock management action? Grazing practices in earlier years when range livestock operators were competing for range use have

been improved since the development of controlled grazing by land management. Vegetation and soil tolerances are taken into consideration to relieve grazing pressures of livestock; however, game animals and wildlife should also be controlled for planned grazing management. The number, kind and location of livestock, and timing of the grazing, have been adjusted to restore and maintain the national resources.

The impact statement proposing four alternatives seems to be an indictment of past management and proposals for future management. We feel the statement overlooks the increased beneficial use of national resource lands since the implementation of scientific grazing management.

79-13 | Rangelands have not continued to deteriorate, as implied on page
| I-12.

Increased grass production as a result of sagebrush spraying, as noted in the formentioned pesticide study, has resulted in range improvement to support more livestock production and larger numbers of game animals.

79-14 | On page III-20, the impact statement refers to the introduction of
| chlorinated hydrocarbons for chemical treatment of vegetation. Herbicides
| are not classified by pesticide specialists as chlorinated hydrocarbons.
| Herbicides are not saturated with chlorine, as are insecticides such as
| DDT, dieldrin, hectachlor, etc. Herbicides are much less toxic than the
| insecticides.

Conclusion

We are concerned that although the impact statement explores in depth the environmental problems of air pollution and the preservation of game and wildlife, it shows very little concern for the human aspects of the environment. Ranch families who hold grazing permits, and others who live in their communities, would be directly affected by any changes in BLM

policies regarding grazing land management. Yet, there seems to be more emphasis on the effect for wild horses and burros than for humans.

We fully endorse the review of the draft EIS by the task force of The Council for Agricultural Science and Technology. This report is a collective effort of fourteen scientists located in Arizona, California, Colorado, Idaho, Nevada, New Mexico, Utah, Wyoming and Washington, D.C. and we feel the review is an unbiased comment on grazing lands management by eminently qualified persons.

We recommend rejection of Alternative A, custodial management, and Alternative B, no grazing.

Alternative C, maximize livestock production, which would provide for livestock grazing as the dominant use of NRL, does not conform to the multiple-use concept which this Association endorses.

We cannot endorse Alternative D, acceleration of the livestock grazing management program, because we feel it is a justification for expansion of the BLM bureaucracy, with possible minimal benefits to all users at probable increased costs.

We recommend retention of the procedures now in progress to encourage, but not compel, livestock operators to develop allotment management plans, with assistance from the land administering agency.

Key No.

- 79-1 See item 2, page IX-6 of the EIS.
- 79-2 Refer to reference 3, page I-24 of the EIS. Discussion on page VII of The Western Range should satisfy the reviewer's inquiry on the source of information to conclude that the millions of acres of rangeland that were overgrazed during the past century sets the stage for needed improvements.
- 79-3 See item 5b, page IX-8 of the EIS.
- 79-4 Text revised. See page II-16 and Appendix II-G of the EIS.
- 79-5 See items 5a, b and c, pages IX-7 through 9 of the EIS. Also see response to comment 77-2.
- 79-6 The income effects described in the text in dollar amounts would be the effect whether they are in rural or urban areas; only the percentage comparisons to total personal income are affected by inclusion of urban areas.
- 79-7 The essence of the impact statement is correct in highlighting the number of archeologic and historic sites located throughout the national resource lands. The great majority of these lack formal physical or administrative protection due to lack of adequate funding and manpower. Although each site cannot be preserved, the BLM is mandated by various laws and directives, e.g., Antiquities Act of 1906; Historic Sites Preservation Act of 1966; Executive Order 11593; to inventory and protect significant cultural resources. Based on their significance, determined through the Bureau Planning System, decisions to preserve and protect are made. At any rate no known site could be allowed to be destroyed without first determining its significance and protecting it or salvaging its cultural values.
- Other natural features, including unique geologic phenomena, are normally identified and managed in the same manner. However, the Bureau does not have direct legislative mandate to protect those sites but does so under administrative authorization for multiple land use management.
- 79-8 See page I-3 of the EIS. Proper livestock grazing is a very effective tool for reducing fire hazards by utilization of the forage. However, overutilization of high quality native vegetation by livestock in some areas has resulted in an invasion of undesirable annual grasses and forbs that have increased the fire potential because they mature early in the season and become hazardous fuel

Key No.

- 79-8 types. An example is "cheat-grass," a short-lived annual grass
(cont.) common to the Rocky Mountain states.
- 79-9 If grazing permits for domestic livestock were suspended, wildlife and wild horses and burros may expand to fill the void and result in overuse of the vegetative resources. Responsible Federal and state agencies could be expected to exercise more stringent controls to prevent numbers of these animals from destroying their habitat.
- 79-10 Several statements in the EIS allude to the benefit of additional water developments for wildlife, livestock and wild horses and burros and recognize the contribution of livestock operators in construction and maintenance of these facilities. See pages III-26, III-29 and VIII-8 and item 2 on page IX-6.
- 79-11 It is probably true that if livestock were removed and predator control practices were, therefore, not required predation would increase on wildlife species.
- 79-12 Part I of the EIS describes the continuation of the present grazing program.
- 79-13 The statement does not contend that improvements in rangeland conditions have not occurred over the past 40 years. However, deterioration is occurring on many grazing allotments and will continue to do so until proper management is adopted. As stated in the text the purpose of the AMP program will be to halt and reverse the declining trend on those areas where such deterioration is taking place.
- 79-14 Text revised. See page III-15 of the EIS.

ULOCK RANCH
CAPITAN, NEW MEXICO

ADOBE RANCH
MAGDALENA, NEW MEXICO

J. R. CANNING

PHONE (915) 869-3981
EDEN, TEXAS 76837



REGISTERED
AND
COMMERCIAL
BRANGUS
CATTLE

ADDRESS REPLY TO:

R. A. CANNING

PHONE (505) 354-2385, 2384
P.O. Box 236
CAPITAN, NEW MEXICO 88316

April 27, 1974

Mr. Roger C. B. Morton
Secretary of the Interior
Department of the Interior
Washington, D. C. 20510

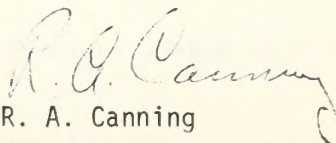
Dear Mr. Secretary:

I understand that you are inviting comments on the Environmental Impact Statement concerning livestock grazing on public lands. I have been unable to obtain a copy of this statement, therefore my comments will be limited to the general statement.

Livestock grazing should be continued on public lands because the grass that grows on public lands is a commodity that replenishes itself each year and can only be harvested by the grazing of livestock. To remove livestock would be wasting this national resource.

Over the years that the Bureau of Land Management has managed this public land, and incidently I feel that they have done a good job in protecting this public land, the grazing and the grass land has improved vastly to provide food and fiber for the people of the United States. Wildlife habitat through improved management practices has also improved greatly. The grazing permittees who use this public land under the management of the Bureau of Land Management are without a doubt the cheapest caretakers available. Grazing must definitely be continued in order to harvest the grass crop.

Sincerely,


R. A. Canning

RAC/f
CC: Bureau of Land Management
Federal Building
Santa Fe, N. M.

NORTHWESTERN UNIVERSITY

EVANSTON, ILLINOIS 60201

PUBLIC LANDS PROJECT

2040 SHERIDAN ROAD
EVANSTON, ILLINOIS 60201
TELEPHONE (312) 492-3559

May 21, 1974

Mr. Curtis Berklund, Director
Bureau of Land Management
U.S. Department of the Interior
Washington, D.C. 20240Re: Livestock Grazing Management
on National Resource Lands,
Draft Environmental Impact Statement

Dear Mr. Berklund:

The following comments are on the above-mentioned DEIS, and represent the comments of the Public Lands Project, an academic study group which conducts research on natural resources policy issues. The comments are not those of Northwestern University.

1. Background of Commentator. I am a Research Associate with the Public Lands Project, whose training is in the field of Political Science and Public Administration. In particular, my research interests include the politics of public lands management, and my dissertation research is on administrative and interest groups politics in land management at the local level of the Bureau and the U.S. Forest Service. That research involved field work, including interviewing of agency personnel and interest group leaders, on nine Bureau Resource Areas and 28 Forest Service Ranger Districts in three Western states; this field work took place approximately one year ago.

2. Quality of the DEIS. The Bureau is to be commended for writing an atypically thorough and almost scholarly DEIS. The DEIS reflects an apparent familiarity of the writers with a substantial body of literature on the physiology of the NRL. While the social science reflected in the document is somewhat less thoroughly done, it is still a somewhat more detailed treatment of the social impacts of the NRL than is the norm in EIS-writing. I make these comments based on a substantial research involvement of the Public Lands Project in the environmental impact statement process.

An important exception to this praise is your treatment of economic impacts under the several alternative assumptions. This is important since economic benefits of livestock grazing are the primary benefit of the program. Questions you should have addressed include:

- 81-1 (a) Is grazing on the NRL an economically efficient method of livestock production?
- 81-2 (b) Is livestock grazing generally the highest and best economic use of the NRL (e.g., as opposed to the economic benefits associated with other, competing uses such as wildlife production and/or other forms of recreation).

MAY 29 1974

OFFICE OF THE DIRECTOR
BUREAU OF LAND MANAGEMENT

The economic analyses of pages III-48 through III-52, VIII-10 through VIII-11, VIII-16 (#19) and Appendix III-A do not address these questions comprehensively.

3. Non-Comprehensiveness of Alternatives Discussed. The DEIS discusses five alternatives:

- (a) The "proposal," implementation of Allotment Management Plans (AMPs), emphasizing rest-rotation grazing systems, on all NLR suitable for grazing;
- (b) "Custodial management," more aptly described as non-management;
- (c) "Removal of Livestock Grazing from the NRL," essentially leaving the NRL to wildlife;
- (d) "Maximum," apparently uncontrolled, livestock production; and
- (e) The "proposal," with a completion date ten years early.

Looking at the policy choices, as opposed to the mechanical implementation of those policies, one could collapse the proposal and the last alternative into essentially one alternative.

81-3 The "custodial (non-)management" alternative is not worth discussion by an agency of the professional caliber of the Bureau.

As a general policy, "removal of livestock grazing" has the following flaws:

- (a) if done abruptly, the net resource damage from such a discontinuous change in the physical environment of the NRL would be, probably, a disaster, for the reasons cited in the DEIS;
- (b) even if done gradually, over the long run, there is no evidence presented that the demand for the goods (wildlife) and/or services (recreation) could even approach the levels implied by such a change; and
- (c) such a decision would be absolutely unacceptable to one of the Bureau's most important publics, the livestock industry, and would be, therefore, unacceptable to the Congress.

Primarily for the last reason, political unacceptability, this alternative is not a real option for the Bureau, as should be obvious to any intelligent reader.

The "maximum" livestock production alternative has the following flaws:

81-4 (a) the alternative represents "maximum" production only in the short run, since gross over-grazing would lead to resource damage which would lead to an inability of the land to sustain the high levels of use or eventually even the present levels of use; the Bureau and most livestock operators know the fallacy of this alternative, and that the fallacy was the basis for the Taylor Grazing Act, the Bureau's Multiple Use Act of 1964, and the Bureau's range adjudication process;

- (b) such an approach would be totally unacceptable to the Bureau's conservation group public, and, even in the most improbable situation of the repeal by the Congress of all the Bureau's statutory constraints, would probably be the basis for litigation under the National Environmental Policy Act.

For both reasons, this alternative is not a real option for the Bureau, as should be obvious to any intelligent reader.

In short, the DEIS presents a proposal, with three "straw men." It is also worth noting that the proposal essentially represents the current management direction on the NRL, which is not surprising. (Nor, of course, does that make it wrong.)

The major issue, which was not addressed in the DEIS, is to what extent should the NRL be committed to domestic livestock grazing. Currently that issue, to the extent that it is raised at all, is raised as a part of the Bureau's land use (MFP) planning process. The essential criterion applied by the MFP process is this: Is the planning unit compatible with grazing? If so, livestock should graze it, with such-and-such constraints. This DEIS merely states that, for those areas determined to be compatible with grazing, rest-rotation shall be the management tool.

(4) A Real Alternative: A "Highest and Best Use" Criteria. This alternative would read:

81-5 | "The Bureau will identify areas according to specific criteria where grazing is the highest and best use of the NRL. For those areas where livestock grazing is the highest and best use, the Bureau will implement AMP's, including rest-rotation, adjustment in numbers, season, and/or class of use, etc. For those areas where livestock grazing is not the highest and best use according to the criteria, livestock grazing will be allowed only to the extent that it does not conflict at all with the highest and best use (including, if livestock grazing is not compatible with the highest use, proscribing livestock grazing.)"

Since this policy closely resembles what the Bureau is mandated to do under the Multiple Use Act of 1964, and through the MFP process, the nub of the alternative would be the criteria used to define "highest and best use." That criteria should be a comparative index of contribution to regional economy, assuming different dominant uses of an area: if it should be demonstrated that management for wildlife production for hunting would contribute more to an area than would livestock production, then wildlife management would be the highest and best use.

Please understand that, in suggesting this criterion, I am not ignorant of the Bureau's current MFP process. I advance this criterion because it is clear that the current planning process favors the maintenance of livestock grazing, irrespective of the variable economics of livestock grazing on different types of NRL, because of past uses of the area for livestock grazing, and the lack of a history of wildlife production (due to emphasis on livestock production.) Put another way, the use of the NRL occurred during a time in which livestock production was essentially the only economic (or any other human) use to which the land could be put. Recent changes in the economic system, including rising affluence of urban populations which wish to use the NRL and other federally-owned lands for recreational purposes, were not reflected in changes of use of the NRL through a "marketplace" mechanism because past uses of the land were "locked in" by

administrative regulations and procedures of the Bureau. I am not saying that Bureau personnel are biased in some way against non-livestock uses, or that the Bureau is "captured" by the livestock industry; my own field research, I feel, refutes that commonly-held assumption. But it does seem plausible that, given rising recreational demand, livestock production is not the best use of those kinds of lands which require fifty, one hundred, or two hundred acres per AUM.

5. A Second Alternative: National Specification of Optimum Uses. The "Highest and Best Use" criterion suggested above has one potentially serious flaw: The sum of all of the regional determinations as to optimum uses, collectively, may differ significantly from a similar, national determination of optimum levels of uses. For example, it might be the case that both the Albuquerque and Socorro Districts would use the hunter population of Albuquerque in projecting hunter use; this might lead the two districts, taken together, to set aside more AUM's of forage for wildlife than there was a demand for in the region.

To avoid this sort of outcome, it might be preferable for the Bureau to determine potential regional or national demands for various uses of the NRL, including livestock production, but not exclusively livestock production. Second, the Bureau would use a rough inventory of suitability of various resource areas for non-livestock uses (including such things as geographic proximity to sources of demand for the use.) It would thus be possible to make some intelligent, nation-wide effort to provide an optimum mix of uses and assign use specializations in an optimum manner.

This obviously requires a good deal of work, gathering data and performing some relatively sophisticated modeling. Such work would also probably be open to a certain amount of perfectionist criticism. However, such an alternative approach would be considerably more comprehensive--and thus less likely to be systematically biased in some direction--than present Bureau procedures.

6. Resource Protection as a Basic Constraint. These two suggested alternatives -- "highest and best use" criteria, on the one hand, and determination and distribution of optimum national needs, on the other -- have been advanced with essentially economic decision criteria. To be explicit, the Bureau should consider environmental protection, the prevention of resource damage on the NRL, as a basic constraint. That is, the first stage in any inventory process would eliminate from consideration any uses which might cause resource damage. That is, even if ORV use might turn out to be the economically "highest and best use" of an area of high erosion potential, it would still not be permitted.

81-6 7. Comments on the Proposed Policy. If one assumes that production of forage for domestic livestock is the desired management objective, your management proposal seems to be an excellent one. Although I am not a professional range manager, I have been convinced that rest-rotation is the optimum approach to achieve a joint objective of production of livestock and protection of the land. The mitigating measures described in Section IV seem comprehensive. However the term "avoid" is vague, suggesting the possibility of wide administrative discretion. If the Bureau actually wishes to avoid these problems, it should use the term "not permit," unqualified.

I wish the Bureau all the best luck in the world in marketing this policy to the livestock operators.

8. Gradual Implementation of Major Changes in Grazing Policy. If the Bureau, as a result of implementation of any policy arrived at as a result of this environmental impact statement process, makes any significant reduction in livestock grazing use of the NRL, such an implementation should not be done precipitously. The families which are licensed to run livestock on the NRL are, in most cases, dependent on the NRL for not only income, but, as the DEIS points out very well, important cultural and socio-psychological values. I have a very high, personal regard for those livestock operators who I know and who use the NRL, and it would be, in my opinion, a significant injustice to abruptly terminate these operators' use of the NRL.

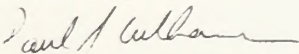
As an alternative to abrupt termination, the Bureau should consider a policy of terminating leases to use areas deemed inappropriate for livestock grazing, as a result of policy decisions to emphasize some other higher and better use, only at that time when ownership of a livestock operation on which grazing rights are bases is transferred from one individual to another (for example, through sale, or death of the operator.)

9. Analysis of Public Response to the DEIS. The Bureau will undoubtedly receive a large number of comments on the DEIS. To adequately cover the "Consultation With Others" section in the FEIS, please do the following:

- (a) Utilize content analysis to summarize comment received from the public, both for the information of agency decision-makers and for the benefit of sophisticated readers of the FEIS. If not familiar with the literature on the use of this technique in evaluating public involvement in public lands decision-making, you might consult USDA Forest Service, "A Guide to Public Involvement in Decision Making," Washington, 1971, or George H. Stankey, "The Use of Content Analysis in Resource Decision Making," Journal of Forestry, 1972.
- (b) The Bureau may decide that, in the interests of parsimony and the Bureau's printing budget, it is inappropriate to re-print all comments received in the FEIS. However, so that readers can see "important" comments, please re-print written comments from the obvious, major national organizations such as the National Woolgrowers', National Cattlemens', National Wildlife Federation, and so forth. Comments from academic consultants, such as those mentioned in the DEIS, would also be insturctive, but yet not unmanageable.

Conclusion. Thank you very much for the opportunity to comment on this DEIS. I sincerely hope that the Bureau will, in the Final EIS, consider a fuller, more realistic range of alternatives so that the thorough discussion in the text will not be tarnished by a consideration of restricted, unrealistic alternatives.

Sincerely,



Paul J. Culhane
Research Associate

PJC/kam

Key No.

- 81-1 This comment implies the use of benefit-cost analysis which is addressed in response to comment 23-3. As long as returns are positive, there would be some level of cost and investment which would be efficient. These conditions would vary between AMP's and cannot be meaningfully evaluated in a document of this scope.
- 81-2 This comment is closely tied to comment 81-5. While the respondent's research may have led to certain conclusions about past applications of the Bureau's planning system, the objective of the management framework plan (MFP) is not to determine a single "highest and best" use, but to determine a best combination of uses taking into account present use, future potential and social-economic needs and impacts. In most instances there is no need to identify a single use as "highest," since many uses can be complementary in certain combinations.
- 81-3 See item 10, page IX-12 of the EIS for discussion on alternatives.
- 81-4 The alternative of maximizing livestock production does not intend to exploit the rangeland resource. See Alternative C, page VIII-13.
- 81-5 Under the present livestock grazing program administered in context with the Bureau planning system, the implementation of AMP's can enhance other resource uses, not relegate them. Under the planning system a "highest and best use" criteria is not the objective but might be adopted depending on socio-economic and political considerations. The comment discussing specification of optimum uses has merit and should be explored in refinement of land use planning for national resource lands.
- 81-6 Text revised to be more specific concerning "qualified" language.

[illegible]

CRAIG OSMER, CALIF.
JOE SKUTNITZ, KANS.
RAM STEIGER, ARIZ.
DON H. CLAUDEN, CALIF.
PHILIP E. TOFFEE, MICH.
JOHN N. HAPPY CAMP, OKLA.
MANUEL LUJAN, JR., N. MEX.
JOHN DELLNUACK, OHIO.
KEITH G. SIBELIUS, KANS.
RALPH S. REGULA, OHIO
ALAN STEELMAN, TEX.
DAVID TOWELL, N.V.
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WILLIAM M. KETCHUM, CALIF.
PAUL W. CRONIN, MASS.
DON YOUNG, ALASKA
ROBERT E. BAUMAN, MD.
STEVEN D. SYMMS, IDAHO

WASHINGTON, D.C. 20515

June 17, 1974

Mr. Curt Berklund
Director, Bureau of Land Management
Department of the Interior
Washington, D. C.

Dear Curt:

I am enclosing a copy of a letter you should have already received from Mr. Gene Etchart of Glasgow, Montana. His letter requests an extension of time for public comment on the draft environmental statement concerning livestock grazing management on national resource lands.

I would like to reiterate my support for this request as indicated to you in my letter of June 13, 1974. Again, I urge your prompt consideration of this request.

Kindest personal regards.

Sincerely,

John Melcher

JOHN MELCHER, Chairman
Subcommittee on Public Lands

Glasgow, Montana
June 9, 1974

Mr. Curt Berklund, Director
Bureau of Land Management
Washington, D.C.

Dear Mr. Berklund,

The purpose of this letter is to request that you advance by 60 days the existing June 16th deadline for comments concerning the BLM's Environmental Impact Statement draft on grazing. Very recently I attended a meeting of livestock industry leaders in Denver and most of those present had not yet seen a copy of the draft statement. We did procure some copies for our use while in Denver, but the consideration given the statement was only cursory. Mr. Mons Teigen, Secretary of the Montana Stockgrowers Association asked one of our Congressmen for copies of the draft statement and as of now hasn't received them. Only a very few livestock people have had access to the statement and fewer still have had the opportunity to deliberate its content. In order for the livestock industry to contribute intelligent and meaningful input, additional time is needed. I hope that in light of the foregoing, you can arrange to extend the deadline for comment.

82-1

In the event that the deadline is not extended, I would like to take this opportunity to offer a few comments which are intended to be constructive. I have not had the opportunity to carefully study the draft statement and could be mistaken in my initial appraisal. Indeed, I hope my first impression was wrong, but my reaction now is that the draft is a one-sided presentation that tends to indict the livestock industry and the BLM for what it contends is a widespread deterioration of the public lands.

The authors of the draft statement have selected data and information and then presented it in a manner that would lead an otherwise uninformed reader to conclude that both the livestock industry and the BLM had failed miserably during their stewardship of the range lands since the passage of the Taylor Grazing Act. The tone of the document is negative with respect to past performances of stockmen and the Bureau, but the same material and other data left unused could support a positive case and contrary conclusions. For example, early in the statement there is a sweeping observation that the N.R.L. lands have been in a deteriorating condition for the last century. Even that statement is open to controversy, but the draft makes it seem obvious that the worsening condition is real and

that the culprit is the stockman. What the statement fails to say in this regard is important. It fails to point out that the alleged abused and overgrazed condition of the ranges could not have been the blame of the livestock industry. Until only recently, Congress held a policy of free, open and uncontrolled use of the range. This unrestricted grazing by all comers was the real reason for any decline in range condition over the past 100 years. The livestock industry was instrumental in securing passage of the Taylor Grazing Act which was designed to prevent the damage done by over-grazing. Mr. Director, I don't have to remind you that the livestock industry is the party most grievously injured by damaged rangelands. Our concern for the well-being of the range is genuine and long-lived. But, I notice no mention of these considerations which might give the whole draft statement a different effect. Neither did I notice any attempt to point out what has happened on the ranges since the passage of the Taylor Act in 1934. It seems to me that a realistic treatment of the subject would necessarily include a mention of the reversal of the downward trend and the many range improvements accomplished in the few decades since the enactment of the Taylor Act.

I am personally certain that the condition of the range lands in Montana has improved over the last 30 years and that the livestock industry cooperating with the BLM has played a positive role in bringing about many improvements. Among these advancements would be more A.U.M.s for livestock grazing, more and improved wildlife habitats, a tremendous increase in water development, fencing designed to accomplish range management but when coupled with the other improvements leads to a better environment for wildlife, fish, water fowl and etc. Records indicate our game populations have increased ten to 100 fold in this span of time. I can recall a time when the deer in the Southern portion of my home county numbered only a few dozen, today a count would show many thousands. I mention these things to point to a few facts that would be supportive of a positive argument of accomplishment through the efforts of the BLM and the livestock industry and leave the casual reader with a substantially different impression than that gleaned from a reading of the statement as currently written.

My criticism of the draft statement is general, but I'd like to point to one specific instance which seems typical of the treatment afforded the livestock industry. The draft statement gives the impression that neither the BLM nor the stockmen did anything to improve the condition of the range until the A.M.P. was developed about five years ago. If my interpretation of the message is valid, I must register my disagreement with the A.M.P. being the "original" positive accomplishment by the BLM and the industry. While discussing the

82-3 merits and successes of the A.M.P. program (at mid-page, I-24),
the draft statement speaks of apparently unqualified acceptance
by several groups then finally completes the list with "...in
addition to many livestock people." The inference is trans-
parent. Again, the suggestion of the grudging and recalcitrant
stockman. A more complete tracing of the evolution of the
82-4 A.M.P. program should include the fact that the A.M.P. is pat-
ently impossible without the combined effort of the BLM and the
rancher. The effort of the stockman requires the expenditure
of considerable time, energy and resources. Further, these ex-
penditures are made voluntarily by stockmen and a long waiting
list to the A.M.P. exists. A mention of these facts would have
painted an entirely different portrait of the livestock industry.
This one instance seems typical of what I consider to be a one-
sided portrayal of grazing on the public lands in 1974.

Perhaps in conclusion it would be good to recall the man-
date of 1934, where the fore-runner of the BLM was charged with
conserving the range and stabilizing the livestock industry.
Only a glance at the history of the BLM working with livestock
people will reveal many proud accomplishments and point to a
bright and promising future. The gloomy recital to the contrary
contained in the draft statement serves no useful purpose.

Again, I'd like you to consider an extension on the dead-
line for commentary. Should that extension be forthcoming,
you can be assured of thoughtful contributions from the live-
stock industry on this important matter. Thank you for your
consideration.

Sincerely yours,

Gene E. Echart

Gene Etchart

Key No. 82

Key No.

- 82-1 See item 1, page IX-5 of the EIS.
- 82-2 See item 2, page IX-6 of the EIS.
- 82-3 Text revised to reflect true meaning of the sentence. See page I-19 of the EIS.
- 82-4 See Glossary for definition of allotment management plan. Agree that rancher cooperation is desirable and important. However, there may be instances when the AMP (grazing system) will have to be implemented regardless of the objections of the stockmen.

RALPH B. HELM
WAYNE K. LEMIEUX
DAVID B. BREARLEY

LAW OFFICES
RALPH B. HELM
4063 RADFORD AVENUE
STUDIO CITY, CALIFORNIA 91604
TELEPHONE
(AREA CODE 213)
877-1526

June 13, 1974

United States Department of the Interior
Office of Public Affairs
Bureau of Land Management (130)
Washington, D.C. 20240

Re: Environmental Impact Statement for Livestock Grazing Management on National Resource Land

On behalf of the City of California City, a general law city located in the State of California, we would like to present the following comments relative to the environmental impact statement for livestock grazing management on national resource land which is presently pending.

The City of California City is located in the area generally known as the Mojave Desert and is surrounded by extensive acreage owned by the United States of America and operated by the Bureau of Land Management. From time to time in the past years, the Bureau of Land Management has issued permits for the grazing of livestock on the "BLM Lands" located in the vicinity of the City.

Despite the fact that the grazing permit in no way entitles the permittee to graze livestock within the City, it has been our experience that the permittees are either unwilling or unable to control their operation and avoid grazing within the territorial limits of the City. Even though much of the lands in the vicinity of California City are unimproved desert lands, much of the uninhabited territory within the City has been subdivided and preliminary roads have been laid out.

The grazing of livestock, particularly sheep, within the boundaries of California City is prohibited by City Ordinance. Such activity is prohibited because: (1) It destroys the scenic beauty of desert terrain by eliminating attractive flora which would otherwise flourish in the area such as wild flowers, (2) By removing natural vegetation it exposes the lands which have been grazed to the eroding effect of the high winds which are often encountered in the area, and (3) The removal of ground cover will usually result in a substantially

LAW OFFICES
RALPH B. HELM

U.S. Dept. of the Interior

-2-

June 13, 1974

higher concentration of blowing dust and sand in the areas which have been grazed.

Based upon the foregoing, it is our opinion that the environmental impact statement presently under study should recognize that when grazing permits are issued by the Bureau of Land Management, at least in the Mojave Desert area, that the permittees allow their livestock to graze on adjacent lands even though not covered by the permit. The statement should also conclude that such intrusion upon adjacent lands could result in violation of local regulations prohibiting livestock grazing and in any case such livestock grazing generates adverse environmental effects, both short-term and long-term, which are not outweighed by the benefits of the program, particularly when a grazing permit involves the grazing of livestock in desert area such as the Mojave Desert.

83-1 Finally, it is submitted, that because the grazing policies of the Bureau of Land Management will have drastically different environmental effects depending upon the particular geographic area in which the grazing permit will be issued and depending upon the status of the environment at a particular point in time, it is apparent that an environmental impact statement must be prepared each time a permit is proposed to be issued by the Bureau of Land Management. It is further submitted that an environmental impact statement which would purport to cover the subject of livestock grazing management on United States Lands as it occurs throughout the Nation is inappropriate in that it cannot possibly consider all of the variables which may be involved in the particular grazing permit.

Thank you for the opportunity to address you on this subject.

RALPH B. HELM


Wayne K. Lemieux

WKL/rg

cc: R.G. Isenberg, City Manager, City of California City
Louis A. Boll, Dist. Mgr., Bureau of Land Management,
800 Truxtun Avenue, Room 311, Bakersfield, CA 93301
Re: 4115.2 0401-28

Key No.

83-1 See item 3, page IX-6 of the EIS.

Comments---Ellen Louise Pfister

Draft Environmental Impact Statement--

Livestock Grazing Management on National Resource Lands

by U. S. Department of the Interior, Bureau of Land Management
March 1974

84-1 This DEIS is apparently a document which will affect the manner of operation and economic well-being of thousands of ranchers, large and small, in the eleven Western States, yet the document gives no clue as to the real cause of its preparation and issuance to answer the why of Bureau policy justification in mid-stream. There is no evidence in the document that it was circulated to the parties most directly affected, i. e., the permittees, lessees, and exchangees of the Bureau. No grazing district board received a copy. The ANCA and the Woolgrowers do not speak for all cattlemen and sheepmen, and no farm organizations were notified at all. Certainly in my grazing district of Buffalo Creek, there are probably as many farmers as ranchers who are permittees. The document is at least an eight hour read and digest job, and the limited distribution and numbers of copies controlled the amount of comment that much more.

84-2 The document purports to cover the 11 Western States as named on page I-1, however, there are references to range conditions in Kansas, Oklahoma, Texas, and Nebraska, as well as references to range use methods predicated on experiments conducted in those states. It would be well to have experiments from the actual states involved, rather than their Eastern neighbors. There are definite differences in soils, topography, climate, and vegetative mix.

84-3 For instance, some of the material in Appendix II-D is irrelevant for the purpose of this DEIS, because those soils types are for states which are not the subject of this DEIS, and yet Wyoming, a state heavily affected with NRL, has not a single soil series named in the list, and Montana is lightly covered.

84-4

The BLM jurisdictional map on Page I-23 is of very rough quality, for instance I had no idea that the entire Willamette Valley in Oregon was under BLM management, including Portland, Eugene and others. Other areas are probably just that much inaccurate.

84-5

Presumably the BLM management program is based upon the condition of the range, which is looked at once every ten years. For the purposes of this DEIS, the range survey used was done in 1964. The range condition estimates are ten years old. If this DEIS is the front for something important which may affect operators shortly, then the BLM is doing its permittees and lessees a disservice. In the Buffalo Creek Grazing District cattle numbers were drastically restricted after that grass survey, therefore, it would seem that NRL in that Grazing District should be in better shape today than in 1964. It would seem that monitoring range condition in ten year increments is a rather imprecise method of procedure. There was no mention in the DEIS whether any action of a concerted nature was taken by the BLM as a result of the last range survey in 1964. If, on the whole, grazing allotments were cut back ten years ago, it would be very unfair to restrict permits and leases even further as a result of actions taken based on a DEIS using range information ten years old.

84-6

The DEIS failed to discuss in any depth the effect that restriction or abolition would have on the nation's red meat and wool supply. In one respect the operation of the NRL by the BLM has resulted, not only in cheaper operation for the rancher or as a subsidy, but also as a subsidy to the consumer in the form of a larger meat supply and a meat supply for which the producer could afford to take less in the marketplace.

The writers of the DEIS assumed that sheep contributed only to the nation's red meat supply, and did not discuss or consider the contribution to the nation's fiber supply in the form of wool. It may well be that if the "energy crisis" continues that certain kinds of petroleum based synthetic fiber will have to be phased out in favor of wool again.

It is unclear from reading the statement just exactly what the program of the BLM is with respect to grazing now. It seems to be relatively clear what it is going to be in the future, but even then it is somewhat cloudy with respect to policy in the grazing districts. However, it seems to be futile to attempt to do more than custodial work unless a better determination is arrived at on the affect of the coal problem with respect to the NRL available for grazing purposes. The discussion of the mineral problem, especially respecting coal in this DEIS is sub-high school level, particularly since there is presently a two volume tome in circulation on the effects of Federal coal leasing policy. There is no point in undertaking a group of AMP's on land which may ultimately be torn up by strip mining. A comparison of the maps in the coal DEIS and the map supplied in this DEIS seems to indicate that a great deal of this publicly owned western land may well be stripped for coal unless other steps are taken to obtain a less destructive source of energy. Until this coal problem is settled any permittee or lessee would be fool to break his neck to improve his allotment only to have it strip mined. To force him to do so would be a high-handed case of tunnel vision on the part of the Department of the Interior. If these NRL lands are strip mined, then there would be a far greater reduction in cattle production from these lands than is contemplated in most of the scenarios of use noted.

The AMP program expects quite a lot of time and financial outlay from the operator. It is admitted that there may be reduction in numbers, certain use restrictions, and much concern for the non-paying recreationist. Approximately half of the permittees and lessees have permits for relatively small numbers of cattle (200 head rough cut-off). It is recommended that if the use restrictions put the operator in a bind, that he acquire more base unit. In states such as Nevada, where the U. S. owns approximately 85% of the land area, the chances are good that the land is pretty well taken up already. I know that in our area there are no loose pieces lying around for sale. The idea for the expansion probably contemplates the buy-out of another operator, further reducing the number of people in agriculture. It is mentioned that implementation of the AMPs will promote economic stability in an area. I have my doubts about that because the BLM is part of the executive branch of government, and as such is also sensitive to political winds. No ranching operation based primarily on federal lands or even on fee lands which may be affected by federal action, such as activation of mineral reservations, can be considered a stable operation. Under the AMPs AUMs may be adjusted by "mutual agreement", but in observing past hassles of the Buffalo Creek Grazing District with the BLM, there is probably no "mutual agreement" when dealing with the government, because the government has all the cards.

The DEIS seemed to be preoccupied with controlling sagebrush. Its program of concentrated grazing is probably not appropriate for controlling brome snakeweed, unless grazed to starvation level. There is further no distinction made between varieties of sagebrush, some of which are good winterfeed for cattle as well as wildlife. There is further no estimate made as to the permanence of the vegetative manipulation. The duration

and permanence of such manipulation would be a primary factor in determining whether it was worth the expenditure from the public and private treasuries.

The DEIS writers seemd to think that windmills were a questionable item from an aesthtic point of view. If utility is beauty, as some artists and designers contend, then a windmill is a beautiful item. It denotes water in a land of scarcity, and water is life. A windmill is one of the least energy consuming ways of obtaining that water. The tower, motor, and wheel should have an effective life of 50 years if properly maintained. A windmill has no ugly electric distribution lines running into it, and no chuggy, smelly gasoline motor and jack to shatter the quietness. Many town people and recreationists have never seen one in operation, and find them as much a novelty and reminder of the old West as a line cabin. Furthermore, a windmill is too large to be easily stolen or carried off, as opposed to electric or gasoline motors and pump jacks. About the only thing that a windmill is subject to is target practice by gun toters. There is no discussion of the impact of electric distribution lines aesthetically.

84-7

One questions arises in respect to the AMFs. One page III-13, it is stated that under AMP management in some cases, reservoirs have gone dry as a result of the increased forage. Then on Page III-15 under implementation of the AMP Program the contruction of 25,000 additional small reservoirs is contemplated. If the run off is materially decreased under this program, where does the ELM propose to get the water to fill these additional 25,000 reservoirs? I would further estimate that it is entirely possible that half to two-thirds of them may be successful, and the balance duds. That is about our ratio of success on our ranch with most of the reservoirs built with federal advice.

The DEIS is very superficial in its consideration of the human impact of the proposed actions. The United States Government has seen fit to retain in its ownership large portions of the Western States. An economy and a community has been built which is dependent on those federal lands.

84-8 The lack of revenue, which would come to those communities if the land were subject to state and county taxation, has a depressing effect on the tax base. In the area with which I am familiar, there is no way that the grazing fees paid in for use of that land and partially funneled back to the state can even half meet the property tax levied on other private lands of equivalent character. Because of the retention of so much land in federal ownership, there has been no way that the private owner could acquire more land in sections of Nevada and Wyoming, and there has been incentive to be cautious about improving lands owned by another, further depressing what could have been a better tax base. These lands are here with us, not with the New Yorkers, and it is the labor and money of the locals proposed to be used, and therefore, there should be some security of tenure better than the present system.

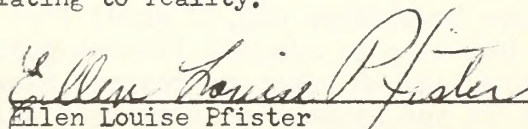
A passing mention was made of fertilization of NRL. Which lands are to be fertilized should be clarified, because at present, experiments indicate that little increased forage production is gained by fertilizing native range.

Here and there throughout the DEIS there are gaps in informational data, which might be fairly easily remedied if BLM personnel were retained in an area long enough to become thoroughly knowledgeable concerning the lands in their district, and if during their time "in the field", they spent a little more time walking or on horseback instead of on their four wheels driving along the same trails.

The livestock operators pay users fees for the NRL. If that livestock operator wants to go to town to recreate, he has to pay for his recreation. About the only thing in town that one does not have to pay for is hanging around on the street, and then one might get picked up for vagrancy. It would be fair enough for the recreationist and public viewer on the NRL to pay a fee for the privilege and for the roads for which they use, to the detriment of the road. If it is important enough for the recreationist to buy gasoline, orv, or snowmobile or whatever he uses to recreate, it is important enough for that user to pay a fee for his use of the NRL.

The DEIS discussed in general terms the effect of reduction in livestock numbers, but it did not discuss in much detail the groups of users who would be the most seriously affected. Approximately half the users are relatively small operators. A cut back on that operator would draw pretty serious blood, but might be more of a scratch on a large operator. The DEIS discusses such effects in bloodless terms, but there is a human factor in the environment, and it must be taken into account. The terms used in the DEIS remove its operation from reality. No rancher goes broke on account of BLM action; he merely has his numbers reduced or his herd made flexible with kinds of cattle for which there is no sale.

There are pages and pages of things which could be said about this statement, but I think it could be summed up as an abstraction which converts grass, livestock, and people into concepts hardly relating to reality.


Ellen Louise Pfister
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Permittee in the Buffalo Creek Grazing District

Key No.

- 84-1 Notice of the availability of the Draft Environmental Impact Statement was published in the Federal Register on April 10, 1974. In addition, press releases were made available to the news media indicating the availability of the statement and methods for obtaining a copy of same. No request for the Environmental Impact Statement was refused.
- 84-2 Many references are also cited from the actual states involved listed on page I-1. New principles discovered by experimental studies may be adapted and applied to other areas far removed from the site of the study.
- 84-3 The soils given in Appendix II-D are the major occurring soil series in the 11 Western States. The location given is where the soil was described; it may occur in many other areas or only in that area. Soils described in Montana, Colorado, etc., also occur in Wyoming.
- 84-4 The map was for the stated purpose of showing the location of principal concentrations of national resource lands in the western United States. See page I-20 of the EIS. It does not purport to show any area as being entirely under BLM jurisdiction. It would be impractical to attempt publication of detailed status maps for the purpose of this statement.
- 84-5 Admittedly the range condition data shown for 1964 are 10 years old. BLM has not collected any such data since that year. The data are merely used for comparative purposes with estimates for future improvements in range conditions.
- 84-6 Supply effects of removal are discussed on page VIII-7 of the EIS including quantification of expected loss.
- 84-7 The situations in which reservoirs have gone dry because of increased vegetative cover as a result of an AMP are extremely rare but may become more prevalent as the program becomes fully implemented. However, BLM engineers have become more successful in selecting reservoir sites and the number of "duds" is practically nil. Water to fill these 25,000 additional reservoirs to fully implement the program will largely be overland flow. It is true that with increased vegetative cover on the watershed above the reservoir, overland flow will be reduced but it only takes one storm of sufficient intensity, duration and areal extent to provide water to fill the reservoir. If the soil is already saturated from a previous storm, much more of the current precipitation will flow to the reservoir. It is believed that the increased vegetation cover will retard the velocity of overland flow, resulting in less

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84-7 sedimentation of the reservoir but only rarely would overland flow
(cont.) be totally eliminated.

84-8 The Public Land Law Commission concluded that existing revenue-sharing programs (originally designed to offset the tax immunity of Federal lands) do not meet a standard of equity and fair treatment either to state and local governments or to the Federal taxpayers.

The Commission review revealed several defects in the revenue-sharing system. In some cases, payments made by Federal programs under compensate, while in others they overcompensate. The revenue-sharing programs, moreover, do not apply to many federally owned lands and where they do apply, management decisions often reduce or eliminate the revenue base upon which the payments to state and local governments depend. At the same time, pressures can be generated to institute programs that will produce revenue though such programs might be in conflict with good conservation-management practices.

1885 S. Jackson St.
Denver, Colorado 80210
June 12, 1974

Director
Bureau of Land Management
U. S. Department of the Interior
Washington, D.C. 20240

Dear Sir:

Please include this letter in the record of public comments on the Bureau of Land Management's Draft Environmental Impact Statement for livestock grazing management on National Resource Lands. Thank you.

85-1 We have read the DEIS, and find that while much information is presented on the grazing lands and the proposed grazing program, many nitty-gritty issues are not presented or fully covered. Our major criticism is that any one Statement could never fully discuss the impacts of a project of such magnitude and extent as the proposed intensive grazing management on BLM's western domain. Hard-hitting, down-to-earth Statements should be prepared at the planning unit level where basic data is developed and lived with day-to-day.

85-2 Another criticism concerns the lack of discussion on the land manager's assumptions and the specific on-the-ground problems that need to be solved. What is the reasoning behind each of the livestock management practices and the supportive measures? What types of alternate grazing systems exist to work with? The livestock management practices and supportive measures should be linked to the environment in each of the subregions. The basic factors of soil, climate, vegetation, and wildlife differ dramatically from subregion to subregion. Grazing practices must also change.

85-3 Extremely important subjects such as consumption, conservation, and efficiency of use of fossil fuel and other energy sources are left out of the present DEIS. The energy budget of the various management practices and supportive measures should be evaluated. This is especially important if this document is going to be a good foundation for subsequent Environmental Statements. It has been said that, "It is a characteristic of mankind to walk into the future facing backwards." In 1974 it should be recognized that fossil fuel resources are limited. Livestock production on rangelands has the potential to be energy producing, which is certainly a worthwhile goal in today's world.

85-4 The impacts of livestock management practices and supportive measures on the substantial wilderness resource remaining on BLM public lands are ignored in the present DEIS. Certainly doubling road and trail mileage, tripling fence mileage, and changing the vegetation on millions of acres might affect some wild lands. Wilderness lands once developed by man are lost for generations. Such a limited, irreplaceable resource should receive careful consideration. We hope impacts on the wilderness resource are fully discussed in the final Statement, which should point out that grazing and wilderness are often compatible uses of the public rangeland.

We have listed below some specific questions and comments referring to particular pages of the DEIS.

- 85-5 Page I-4. Is it correct for every subregion that overgrazed ranges will improve more rapidly with grazing than no grazing? Where is the 10 million acres not suitable for grazing that are now being grazed and what will be done about this situation?
- 85-6 Page I-5. The comment on roads and trails is one-sided, for there are also many adverse impacts. What uses will be allowed on the proposed new trails?
- 85-7 Page I-7. It seems questionable to us that the intensive livestock grazing management program should be given credit for contributing to the Nation's "numbers and variety of wildlife and quality of water." These are basically nature's gifts! Other grazing programs would perhaps cause less disturbance to sensitive animal species and the natural landscape.
- 85-8 Page I-12. We believe private funds should not be used on public lands. Livestock ranchers often forget that BLM lands belong to all the people of this nation and feel they have a special right to do as they please on these lands. Allowing ranchers to spend their own money on public land developments only intensifies this problem.

The criteria for developing and implementing AMP's should primarily be related to the condition of the land resource. Our soil is one of our basic, indispensable resources. Vernon Gill Carter and Tom Dale have written in Topsoil and Civilization concerning the irretrievable nature of soil erosion, "For the regaining requires energy, and that saps away at the good life....In the long run of a civilization, one day the nation will be wanting to regain the lost soil, or replace it. There is no practical way. No way."

- 85-9 Page I-15. How is the rangeland carrying capacity allocated between wildlife, livestock, and feral horses and burros? What is the decision-making process used to resolve the conflicting needs of these animals?

Page I-21. The problems on western rangelands have been of long-standing interest to the conservation community. It is difficult for the public not to appear apathetic when government agencies seem to be entrenched in rigid positions and seem to be unwilling to engage in a free exchange of ideas.

- 85-10 Page I-24. The allotment management plan program can be good or bad, depending on where and how it is used. The statement that the allotment management plan program has gained broad acceptance by conservation groups is too general. Conservationists have had serious reservations about certain aspects of the program. For example, sheep-tight fences which destroy antelope.

Page I-25. The description of the BLM planning system -- "It has techniques requiring the description and comparison of 'trade-off', and what is gained or lost when decisions are made to accept various alternatives." -- shows why this is the level at which full exploration of the impacts of grazing allotment management plans should occur.

85-11 | Page II-23. The map and description of the Palouse prairie do not correspond.

85-12 | Page II-36. The Endangered Species Act of 1973 gives precise definitions to the terms "endangered" and "threatened" species. As yet, under the Act, there are technically no "threatened" wildlife species, but 109 "endangered" species. This Act defines and "endangered" species as "any species which is in danger of extinction throughout all or a significant portion of its range." Thus, the authority exists to manage local disjunct populations and groups of not only species and subspecies but lower taxa.

All members of the plant and animal kingdoms are covered by the Act. All Federal Departments must ensure that their programs carry out the provisions of this Act, specifically by protecting habitat. The BLM's compliance with the Endangered Species Act should be outlined in the final Statement on grazing.

85-13 | Page II-75. The colors of dawn and sunset are certainly not monotonous or flat.

85-14 | Page II-76. To say sound and smell have almost no bearing on the aesthetics of the desert environment is ridiculous. The sound of silence and magnificence of fresh, clear air are almost unique to the desert.

85-15 | Page III-17. What is the origin of the water for wildlife shown in Table III-3?

85-16 | Page III-20. What is the basis for the statement that vegetation manipulation projects will in general enhance air quality by improving vegetative cover?

85-17 | Page III-26. What are the approximate sizes of the pasture subdivisions for the different biome subregions? What will the small wildlife species do when an entire unit is utilized heavily and uniformly? They cannot move to other areas, which presumably would have the necessary ecological niches filled to carrying capacity. The adverse impact of this intensive use is not adequately examined.

85-18 | Page III-27. How can "infrequent use of many roads and trails" be guaranteed? Vehicle recreationists, hunters, and propectors may begin to use these new developments. Are the roads and trails worth the considerable cost to the public if the livestock operators' use is infrequent? What other alternatives exist?

85-19 | What is the probable extent of destruction of other species with vegetation manipulation in each of the subregions? Examples of non-target species should be listed.

85-20 | Page III-29. The statement "Predator control practices have no influence on vegetation" is incomplete at best. What is the effect of the coyote-rodent-vegetation chain on keeping good vegetation cover? Has the research been done to honestly predict whether insect and rodent control will be beneficial to vegetation in the long run? Where are the references to support this statement? Are predator control practices a supportive measure, and if so, why aren't they

mentioned in Part I, in the description of the program?

85-21 | Page III-30. Construction of fences, building roads, etc. will have more than a short term effect on vegetation in many dry, desert areas. Some roads may be essentially permanent scars on the land.

85-22 | Page III-33. The statement "the quality of wildlife habitat will deteriorate on a short term basis" should be elaborated upon--how long is "short term"?

Page III-38. Other aspects of predator control should be mentioned, as in the words of Robinson Jeffers, "What but the wolf's tooth whittled so fine/the fleet limbs of the antelope?"

85-23 | Page III-39. Small game may suffer more hunting and harassment with access roads. More discussion is needed on the adverse effects of mechanical and chemical manipulation, both long and short term.

85-24 | Page III-42. Many of the impacts of dust, soft soil, road hazards, etc. should also be mentioned in the wildlife section.

85-25 | Page III-46. Why wasn't the statement that elimination of predators can be an adverse impact mentioned in other sections?

85-26 | Page III-52. Land use and hazards should be separated from ecological interrelationships. This would expose how very little discussion or knowledge is presented on ecological interrelationships.

85-27 | Page III-57. Adverse impacts of roads and trails should be mentioned. Adverse impacts of eliminating predators should be mentioned.

85-28 | Page III-59. The statement that the long term effect of vegetation manipulation "provides a more pleasing landscape" is an arbitrary value judgment.

85-29 | Page III-62. Livestock grazing management "will result in an aesthetically more pleasing landscape" is also an arbitrary value judgment.

Page IV-1. Further action in the livestock-grazing management program should not be undertaken unless these mitigating measures will be applied.

85-30 | Page IV-5. Regarding (9), energy conservation should be considered.

85-31 | Page IV-6. Regarding (1), biological investigations should also be conducted.

85-32 | Page V-2. The introduction of exotic plant species should be mentioned.

85-33 | Page VII-1. This section is quite incomplete. Fossil fuel use, and in some cases road and trail construction are irreversible and irretrievable commitments of resources.

85-34 | Page VIII-1. An alternative of somewhat less development and reduced numbers of livestock and extent of use should be presented.

85-35

Page VIII-9. The impacts described if there were no grazing should also be presented in the section on impacts of grazing.

In conclusion, we stress that the above mentioned points are but a few examples illustrating the Draft Statement's inadequacies in providing a balanced discussion of all the impacts of this massive program. We reiterate that the only way to adequately deal with the actual impacts in the widely varying environments of the West is to prepare grazing EIS's for each BLM planning unit.

We thank you for the opportunity to comment on this important resource management program.

Sincerely,

Amy Mazza-Scholl

Amy Mazza-Scholl

Roger Scholl

Dr. Roger Scholl

Key No.

- 85-1 See item 3, page IX-6 of the EIS.
- 85-2 Agree that the management actions and supportive measures must deal with the particular grazing allotment where the AMP is to be implemented. See discussion on page I-6 of the EIS.
- 85-3 A realistic comparison of energy requirements would be very difficult to make because records of specific requirements have not been kept. Requirements are variable. It is not intended that a programmatic EIS on livestock grazing should develop such data. At any rate the suggestions have merit for applications in specific proposals such as the development of individual AMP's or an environmental analysis on a specific proposal.
- 85-4 At the present time there are no wilderness areas designated on national resource lands. If and when wilderness areas are designated, BLM will comply with the provisions of the wilderness legislation as it pertains to livestock grazing.
- 85-5 If by "subregion" the respondent means biome, the answer to the question is, "Generally yes, although there may be specific areas where the response is much slower and subtle with proper grazing than with no grazing." Overgrazed ranges from which livestock are removed may respond rapidly and dramatically in the short term. The response can then be further stimulated by proper grazing management in the long term. Perhaps in this case, the management actions may require temporary removal of livestock for a short period followed by proper grazing management for the future. Also see item 8, page IX-11 of the EIS.
- See item 7, page IX-10 of the EIS for a discussion on the estimated 10 million acres not suitable for grazing.
- 85-6 Roads and trails constructed on national resource land are generally open for public use.
- 85-7 The essence of this statement in the document is that management actions and supportive measures, imposed as necessary for multiple use management, will, in most instances, provide increased vegetation for wildlife use and watershed protection. The phrase "intensive livestock grazing management program" means the program of intensive management of grazing use as discussed in the EIS. The suggestion of "other grazing programs" by the respondent implies less intensive efforts than that envisioned by the EIS. The resource manager is given quite a wide variety of "tools" (management actions and supportive measures) to use to accomplish the necessary management at whatever intensiveness is required.

Key No.

- 85-8 See item 4, page IX-7 of the EIS.
- 85-9 See pages I-21 through I-23 of the EIS. Based on the decision of the management framework plan the rangeland carrying capacity is allocated between the competing uses.
- 85-10 True, some conservation groups are still somewhat skeptical of the Bureau's efforts with the AMP program. However, it is believed such skepticism will diminish as they gain more understanding of the concepts and principles involved, and more faith in the capability of BLM resource expertise.
- 85-11 The description of the location of the Palouse prairie has been revised to more nearly coincide with the map.
- 85-12 Text revised. See pages II-28, II-50, II-69 and II-84 of the EIS.
- 85-13 Text revised. See page II-55 of the EIS.
- 85-14 Text revised. See page II-56 of the EIS.
- 85-15 Text revised. See page III-12 of the EIS.
- The heading of the table has been changed and footnotes added to clarify the table. The data are from the Western U.S. Water Plan.
- 85-16 In general, the amount of dust originating from an area is dependent on the amount of bare ground exposed. Therefore, the less bare soil exposed resulting from the treatment will probably result in less dust in the atmosphere. Some work on soil movement due to treatment of mesquite brush in southern New Mexico has been done by Dr. Walter Gould, New Mexico State University. His work indicates substantially less soil movement by wind one year after treatment.
- 85-17 Pasture sizes will vary considerably in all biomes depending on the size of the allotments and the number of pastures necessary to implement the required grazing management system within the allotment. The pastures will not necessarily be utilized heavily to obtain more uniform use at the expense of other resources, including small wildlife species. If a certain amount of vegetation was required for these small species, the management system would be designed to provide for this need.

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85-18 No change proposed.

This is an opinion--the BLM does not profess to "guarantee" infrequent use. In this section we are discussing impacts of supportive measures to the program.

85-19 Text revised. See page III-21 of the EIS.

The probable destruction of other species depends on a great many things such as growth form, stage of susceptibility, time of treatment in relation to growth habit, temperatures reached by fire, etc.

85-20 Text revised. See pages I-3 and III-21 of the EIS.

85-21 Text revised. See page III-22 of the EIS.

85-22 The degree of deterioration of wildlife habitat in use pastures of a livestock rotation system will be dependent upon the concentration, season and length of use. Awareness by the land manager of responsibility to all forms is imperative for development of livestock grazing systems that are least disruptive to the habitats of wildlife species.

85-23 Road construction as a supportive measure to the proposed action could unfavorably affect wildlife populations. Road proposals should be reviewed by state wildlife agencies to assure wildlife values are not jeopardized. Consideration must be given to the desirability of roadless areas on the national resource lands. These will be identified in the development of management framework plans for all areas under BLM jurisdiction.

The major impacts of mechanical and chemical vegetative manipulation are discussed throughout the EIS and additional discussion would not substantially add clarification.

85-24 Impacts of dust on wildlife forms may be similar to that described for livestock but studies are lacking which document this contention.

85-25 The statement is equally applicable to the section on wildlife.

85-26 Land use and hazards are included under ecological interrelationships because certainly "land uses" embody the whole gamut of ecological interactions. This section also was not intended to be an exhaustive reiteration of much of the ecological interrelationships which are discussed throughout the entire EIS.

Key No.

85-27 Text revised. See page III-39 of the EIS.

Predator species will be adversely affected where control methods are implemented as a supportive measure to livestock operations. Predator-prey relationships will also change. Additional explanation is provided on pages III-28 and V-2.

85-28 Text revised. See page III-42 of the EIS.

85-29 Text revised. See page III-43 of the EIS.

85-30 Text revised. Item 9, page IV-5 of the Draft EIS is deleted.

85-31 Biological investigations have been or are being conducted almost continuously in many of the major ecosystems. Much published literature is available.

85-32 Text revised. See page V-2 of the EIS.

85-33 Text revised. See page VII-1 of the EIS.

Major road and trail construction in support of the livestock grazing program is not anticipated. Fossil fuel use in the livestock grazing management program represents a minor consumption of energy.

85-34 The present livestock grazing program provides for flexibility in the amount of livestock use and accompanying supportive measures designed for a particular allotment management plan. The extent of use and development on an allotment is consistent with the other use demands resulting from the land use plan of the particular geographic area.

85-35 The impacts of the no grazing program are presented in the context of discontinuing livestock grazing in a geographic area as a result of the land use plan for that particular area. Naturally, those environmental impacts resulting from removal of livestock, temporarily or permanently, from areas within a grazing allotment, would result to the extent that the removal applies to or affects that particular area within the total allotment.

Harry L. Silcocks
1143 Lambaren Ave.
Livermore, Ca 94550
June 14, 1974

Director, (330)
Bureau of Land Management
Department of the Interior
Washington, D.C. 20240

Dear Sir:

In the Federal Register, April 16, 1974, (39FR13697), notice is given inviting comments on a Draft Environmental Impact Statement on Livestock Grazing Management. I would at this time like to comment on this environmental statement.

I strongly object to the choice of alternatives that are discussed in Part VIII. The alternative of reduced grazing has been completely ignored. By leaving out the alternative of reduced grazing, the alternatives presented become loaded in favor of some form of controlled increased grazing. Any reasonable person would be against Alternative A. Alternative B is also so extreme that it to can not be seriously considered as a reasonable option. The only to alternatives left are "C" and "D". By the authors own admission "...Alternatives "B" and "C" represents an extreme range of action that could be taken under unusual circumstances, including appropriate legislative mandates." The authors also state that "This section presents major viable alternatives to the present program.....". How can alternatives "B" and "C" be major viable alternatives if it will take congressional authority to implement them. The only two alternatives that can properly fall within the consideration of this environmental impact statement are "A" and "D". No reasonable person could be in favor of "A" and "D" is an accelerated version of the "present program" which in itself calls for an increase in grazing. I therefore feel that the four alternatives that have been advanced are slanted to favor either the present program or alternative "D". To be truthful I favor neither and think that consideration should be given to the "present program" with reduced grazing. I think the DES is insufficient in that it did not take the alternative of reduced grazing into consideration. I therefore urge that an alternative be presented that offers reduced grazing as an option, and that this option be fully discussed.

86-1

86-2

86-3

My primary interest lies with the wildlife aspects of this draft environmental statement. I notice in the "Summary", first page, that competition will continue between livestock and wildlife (3B). In an attempt to discover what BLM proposals are in regard to this continued competition I read with alarm that no provision has been made for non-game animals (page I-48, table I-7), with the exception of wild horses and burros. I would like to suggest that the impact of this decision to not provide for non-game animals fully. If no provision will be made for them what will happen to them. If no provision will be made for prairie dog towns, what will happen both to the prairie dog and the black-footed ferret. I assume that no provision will be made for osprey nesting sites. Will provision be made for both golden and bald eagle nesting sites. What will happen to many of these non-game animals if it is not the policy of BLM to provide for their well-being also. They are after all a natural part of our environment and should not be sacrificed to increase grazing. One must remember, for example, that while golden and bald eagles are not considered game animals they are supposed to enjoy federal protection as are wild horses and burros. At least it is not possible to assist in driving eagles over a cliff. While eagles are often accused of predation by the livestock industry they are protected by federal law and this conflict between the livestock industry and eagles should be fully discussed. There are areas where eagles are known to concentrate. What will BLM policy be in these areas in relation to increased grazing. Will grazing be increased or decreased or just what will happen. I feel that adequate provision for non-game animals and endangered species must be considered in any DES relating to national resource lands.

86-4

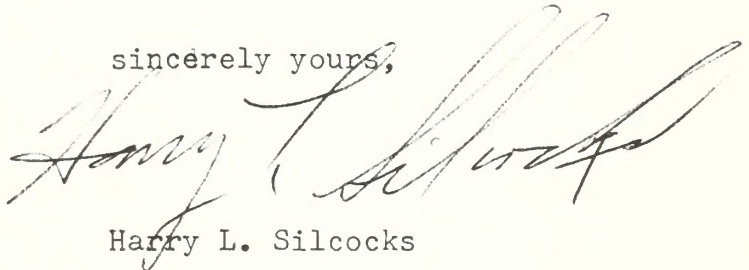
There are many statements made in this draft environmental statement that to me appear to contradict other statements. I would like to cite a few of them. "Livestock removal from portions of some grazing allotments will be required to protect critical wildlife values in all of the biomes." and "On those areas where livestock are removed, initial impacts beneficial to wildlife would be increased forage and cover". However "Exclusive use by wildlife may diminish the initial beneficial impacts of livestock removal on wildlife habitat". "A reduction in predator numbers does not necessarily assure an increase in numbers of prey species where other habitat or physiological factors may control the population". and "Predator control has been effective in aiding in the reestablishment of important wildlife species in some areas". There are many other instances in which I feel that one sentence says one thing while another sentence says something different.

I am espically bothered by the statements on pages IV 8 and 9. I get the feeling that the author has forgotten that the use of poisons are now prohibited on federal lands and that the use of poisons was prohibited on federal lands when this statement was prepared, otherwise I see no need for items 1-3-5-7-8.

86-5 I think this indicates a desire on the part of BLM to return to the use of poisons on federal lands. In item 6 the term "significant damage" is used. The loss of one lamb is considered significant by many sheep herders while it is not to me. On the basis of past actions I fear that the livestock industry will decide what is and what is not significant.

I hope that I have left the impression that I have not been happy with this draft environmental statement. I think that it was written with the intent of trying to please everyone. I cann't be done, it shouldn't be done.

sincerely yours,

A handwritten signature in cursive script, reading "Harry L. Silcocks". The signature is written in dark ink and is positioned above the printed name.

Harry L. Silcocks

Harry L. Silcocks

Key No.

Key No. 86

- 86-1 See item 10, page IX-12 of the EIS.
- 86-2 The present program which is presented under Part I of the EIS provides for reduced grazing as determined by the BLM planning process and the particular management objectives for a given grazing allotment.
- 86-3 Provision for wildlife habitat requirements for all species of wildlife has not been attempted in the draft statement. To do so would be outside of the scope of this statement. Nongame species as well as game species will benefit from properly managed and protected habitat. Improved management of the habitat is integral to the implementation of the proposed grazing management action.
- 86-4 Statements which may appear to be in contradiction must be considered in context. Most statements and sentences do not stand alone.
- 86-5 Text revised. See page IV-6 of the EIS. Control of predatory mammals or birds by use of chemical toxicants is restricted. The field use of chemical toxicants which cause any secondary poisoning effect for the killing of mammals, birds or reptiles is restricted. EO 11643 provides for emergency use of the chemical toxicants upon proper approval. The terminology of "control" in the referenced sections of the EIS should not be construed to provide for use of chemical toxicants.

Meeker, Colo.
June 7, 1974

Curt Burkland
National Director BLM
Dept. of the Interior
Washington, D. C.

Dear Curt:

I am writing in regards to the Environmental Impact Statement on livestock grazing.

I am asking for an extension of time of at least 60 days for the following reasons:

1. Colorado had access to only one copy of the report - at the state office.
2. We were notified that the statement was out and at the Denver office April 20th. This is the busiest time of the year for all livestock people and no one could spend 2 or 3 days in Denver reviewing the report.
3. The State Multiple Use Board meets in Denver the 27th & 28th of June and I feel this board will want to comment on the statement.
4. The Colorado Cattlemen are having their convention June 18th and will make comments to send in at that time.
5. The Colorado Woolgrowers Convention will be held July 20.
6. At a Public Land Council meeting held in Denver June 6, all states felt that a 60 day extension to really study and comment on the Statement is a must.

However, if this isn't granted I want to send in a hasty comment on it - what little I read.

- 87-1
1. No credit has been given to B.L.M. personell, Advisory Boards, or Permittees for any improvement of the Range from 1935 to 1969 when the AMPs were introduced.
 2. The Taylor Act was set up to stabilize and protect the western livestock industry along with improving the ranges. This tends to work the other way.
- 87-2
3. AMPs are real good and I have been for them but this report takes the flexibility away.
 4. Permittees in Utah and Colorado that I am familiar with have taken drastic voluntary reductions to improve the range and to take care of the increase of wildlife - namely deer and antelope.

Curt, as I said, these comments are very hasty. Would really appreciate an extension of time. Enjoyed being with you at Cheyenne.

I got to see H. Loesch in Denver and flew to Grand Junction with him this morning.

Sincerely,

N. L. B.

Key No.

- 87-1 See item 2, page IX-6 of the EIS.
- 87-2 Flexibility as necessary to reach the objectives of the AMP will
be described in the AMP. See page I-A-13 of the EIS.

June 11, 1974

Honorable Roger C. Morton
Secretary of Interior
Washington D.C.

Subject: Draft Environmental Impact Statement on Livestock Grazing
on National Resource Lands.

The Environmental Impact Draft should be withdrawn and corrected.

I am representing the Permitties in Colorado and after reading the draft I find some good statements in it but take exception on the following:

88-1 [1. No credit has been given to the Permitties, Grazing Boards, and BLM personel for the improvement of the Natural Resource Lands from 1934 when the Taylor Act went in until 1964 when Som AMP's were issued.

Thousands of Permittie and Resource Improvement monies have been put in for improvements in the above years and Permitties took voluntary reductions to improve range and increase wildlife.

People won't buy the AMP concept unless they are told that Ranges did improve by the implementation of the Taylor Grazing Act.

88-2 [Because we feel that we've operated on AMP's concept without the paper work for the last 40 years, paragraph two on page I-12 is false and sure discredits the work that has been done by BLM Personel and Permitties.

88-3 [2. We can't go along with the withdrawl of 10 million acres of resource lands for Livestock Grazing - no lands are that bad.

The Taylor Act set Congressional Policy to stabalize the Western livestock industry, manage and improve the lands. This draft tends to tear it down.

88-4 [3. Here in Colorado we intend to work out AMP's with the Permitties wherever possible. But feel they should be flexible to fit the weather and seasons.

This draft doesn't mention flexibility.

88-5 [4. On page I-27, paragraph three, who will determine boundry adjustments, etc. without local grazing boards. No D.M. could or would attempt this.

5. On page II-4, paragraph three, we proved whenever we went on the ground that whoever was conducting the "64" Survey was very biased and that conditions weren't that bad. Wherever there were reductions or adjustments were made till the land was improved by seeding, chaining, spraying, etc. as money became available.

Now the EPA and EIS make it impossible to improve ranges.

88-6 [6. Page II-17, paragraph one, tends to credit the livestock industry supplementing small communities. What will happen to these communities when ten million acres are withdrawn?

7. All of part III is very unspecific and discredits the BLM's own proven survey such as livestock grazing being a tool for increased wildlife habitat forage.

Much is said to increase habitat for horses and burros. This, without managing them, will be the worst thing that will happen to the natural resource lands that we spend thousands of dollars, time and energy to improve in the last 30 years.

You have the best tenants of the land now. Why remove them and destroy your own efforts.

Wild animals have to be controlled and there is no mechanics set up to do this at this time.

Page III-59, paragraph four, really gives environmental groups bullets to shoot as with:

88-7 [We know places where livestock doesn't graze that the wildlife has depleted the range worse than where it is used by both.

I realize that the secretary had to come out with some impact statement to satisfy the pressure put on by a few pseudo environmental groups but this one sure discredits the present tenants.

At our state multiple use board meeting June 27-28, no action was taken as hardly any board members saw the draft till that day.

I am presently chairman of that board also.

Chairman - District I Local Board, Craig Colorado

Chairman - District 8 Local Board, Vernal Utah

Vice President - National Public Lands Council

Chairman - Public Lands Committee of the Colorado Woolgrowers.

In behalf of the above I can say that we surely don't feel that we go along with the draft as written.

It tends to discredit all we have done and strived for - better range management and improved ranges.

We also hope that this doesn't destroy the intent of the Taylor Grazing Act, and becomes the bible the BLM personnel have to abide by.

This will destroy the multiple use act.

The Colorado Woolgrowers won't meet till after the July 16 deadline, but will send in their resolution's later but I as chairman of that committee want these comments endorsed for the C.W.G.A.

Sincerely,

Nick Theos
Nick Theos
8th Street
MEERER, Colorado

Key No.

- 88-1 See item 2, page IX-6 of the EIS.
- 88-2 The statement does not contend that improvements in rangeland conditions have not occurred over the past 40 years. However, deterioration is occurring on many grazing allotments and will continue to do so until proper management is adopted. As stated in the text the purpose of the AMP program will be to halt and reverse the declining trend on those areas where such deterioration is taking place.
- 88-3 See item 7, page IX-10 of the EIS.
- 88-4 Refer to response 87-2. Although the draft does not specifically mention "flexibility," there is sufficient latitude built into the AMP when it is necessary to adjust to changing circumstances.
- 88-5 Those possible actions described in the last paragraph, on page I-27 of the Draft EIS concerning decisions affecting grazing use, are all authorized by and carried out in accordance with the grazing regulations for the public lands.
- 88-6 See item 7, page IX-10 of the EIS.
- 88-7 Text revised. See page III-42 of the EIS.

*Rockin' Cheer Farm*

The Voigts

Blackshear, Ga. 31516
Route 1
Phone 912-449-5271

May 5, 1974

Dr. Glen D. Fulcher
Chief, Standards and Technology
Bureau of Land Management
Denver, Colo., 80225

Dear Glen:

Have received and initially read a copy of the draft EIS on BLM grazing, and initial reaction was favorable indeed. BLM has come a long way from the Ferry Carpenter era! I do have a few comments and questions that I hope will be constructive. I have no pride of authorship of them; just hope a few will be considered sound enough to be given further consideration. Nor do I ask a detailed reply, though I'd like to have comment from your office when you can get to it.

89-1

1. Table I-1, pI-5 speaks of 99,000 miles of needed fence. Would that then, with what's now in place, bound all contemplated AMPs?

89-2

2. Table I-4, pI-13: Would it not be helpful to indicate what percentage of the grazing lands rated "fair" and "poor" were put in those categories for the simple reason that they always were that and forever will be so regardless of how man may treat them?

89-3

3. Regarding pI-21, seems to me the abuses and overuses of range in World War I deserve mention, as well as the excesses during the dry 1930s. They had notable historical impacts.

89-4

4. Others undoubtedly will read information on pI-24 as implying it took BLM and its predecessor agencies 31 years to complete adjudications. Seems a long time. I wondered if the long time wrangling over whether the Taylor Act meant Interior should be a manager or a custodian contributed to the slowness, if it should be judged as such.

5. Table III-3, pIII-17: Here's perhaps a 'way out question: How would anyone go about calculating the volumes of moisture that livestock return, via their rear ends, to the ranges???

89-5

6. Page III-30 is silent regarding any damage that may be done by heavy late grazing to annual grasses and forbs, and some perennials. I assume this was deliberate.

89-6 7. As to page IV-23, drought is insidious, covert. Do any criteria exist for determining the point at which an extended dry spell becomes a drought? How far behind the actuality of drought is it necessary now for forage and soil scientists and managers to operate? Is this worth mention in the final EIS?

89-7 8. Regarding Page IV-8, I'm sure you recognize some environmental purists will always want a total prohibition against killing predators. I consider the principle as laid out in this draft to be defensible in most instances, even though I think of myself as one of the defenders of the predacious species. Your chief problem will continue to be the kind who, like J. B. Wilson back in the 1940s, will say they'll not be satisfied until the last coyote is gone.

89-8 9. Page VI-1 seems to say no reductions in numbers (You seem to say elsewhere that rest-rotation will take care of the seasons of grazing.) will be needed. I wonder if, assuming I'm right, this attitude is realistic.

89-9 10. Part V, Page 1 lists four alternative courses of action. Seems to me it might be fruitful to examine the merits and demerits of an "E" alternative in which judicious reductions, as needed, would be combined with management practices as prescribed in your AMPs.

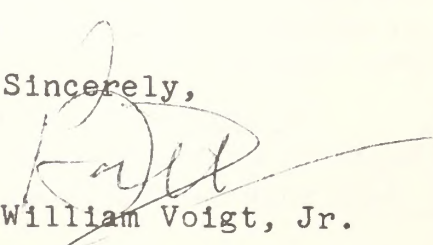
89-10 11. Regarding Pages VIII-9 and 10, Paragraph 6 speaks only of hunter enjoyment of harvestable surpluses of wildlife. Was the enjoyment language intended to cover the additional pounds of meat for the table that also would result? If so, would it not be tactful to say so, and if not, should it not be clarified?

12. As to the list on Page IX-2, I was sorry to see the name of the Izaak Walton League of America was missing. This seems to indicate the League has dropped in agency esteem in recent years, even though the two never were as close as the League and the Forest Service. I have an idea the blame, if that is the right word, rests with the League. No comment on this necessary!

Let's sum up my impressions this way: Your draft EIS is a damn' sight better than a lot of others I've seen.

With my best,

Sincerely,


William Voigt, Jr.

Key No.

- 89-1 The additional 99,000 miles of fencing would provide management control for the AMP program as discussed in the EIS.
- 89-2 Some national resource lands have no ecological potential to ever be rated better than "fair" or "poor" for range forage condition. New BLM procedures will rate range forage condition only on lands suitable for grazing which reflect more accurate condition.
- 89-3 In order to keep the EIS within reasonable limits of size, all material could not be included. Hence, some of the historical information, particularly, was presented very briefly.
- 89-4 It did take BLM over 30 years to essentially complete adjudications if it is considered that adjudications started when the Taylor Grazing Act was passed. However, the main adjudication program began in the middle 1950's. Adjudication of a few allotments is still underway.
- 89-5 Heavy late grazing would not be particularly damaging to annual grasses and forbs. These are usually mature and dry by the fall grazing season. However, there may be some damage to certain perennial grasses and to most shrubs by late grazing. The present program does provide for changing the season of use, where this action is necessary, to reserve the forage for wintering deer herds. The emphasis throughout the EIS is that proper rest and rotation of grazing use would benefit the vegetative resource in the long run regardless of the season of grazing.
- 89-6 Criteria for determining when an extended dry spell becomes a drought seems to vary from region to region, depending on the severity of the dry spell and based on the experience of local residents. In areas where drought occurs with some dependable probability such as the Southwest, it is common to practice a stocking rate at some level below the average production of perennial vegetation. On ephemeral vegetation, the proper approach would be to license livestock grazing only when annual production is available for grazing use, for example during above normal production years.
- 89-7 Predator control is a sensitive issue to both sides of the controversy. The EIS attempts to provide necessary safeguards where predator-insect control is required and would benefit the grazing program on national resource lands. All control programs would be accomplished within executive and legislative mandates from the Federal and state governments, and with adequate consideration for other resources.

Key No.

- 89-8 The reviewer's interpretation of page VI-1 is erroneous concerning reduction in numbers. In some cases, as stated in page I-2 of the EIS, adjustment in numbers and/or removal of livestock are management practices which may be implemented for proper resource management.
- 89-9 Judicious reductions in numbers are implicit throughout the report where such action is necessary to achieve multiple use management. Such action is one of many which can be taken.
- 89-10 The statement (item 6) on page VIII-7 of the EIS has been revised to more clearly indicate that hunter enjoyment includes the additional pounds of meat for human consumption.

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